

Draft Discussion Document Comments November 2003

Comments Received November 18, 19, 21, and 22, 2003

NO.	COMMENT and page # in Draft Disc. Doc.	ACTION	PAGE in new draft
1	General -- Important to make provisions for recording native place names in this process as a management goal. Would include village member efforts to collect names, manage geographical database including names, and to disseminate names to USAG-AK as appropriate. USAG-AK would include permissible names on various maps, street signs if appropriate, in educational material, on signage. The recording of names on maps is important beyond the scope of the HPC and the cooperation and assistance of USAG-AK was requested in developing programs to accomplish this.	Added	See Page 60
2	General -- Need for a clear understanding of the entire process of the development of projects within USAG-AK that will lead to potential impacts on cultural resources and how interested parties can participate in that process. Need a flowchart.	Added	See Figure 6, page 64 for flowchart showing how SOPs relate and Figure 7, page 107 for NEPA flowchart.
3	General -- Include "use of elders" as important sources of information within the HPC.	Added	See Page 59
4	General -- Village representatives discussed the creation of a tribal committee as a point of contact with the Army (USAG-AK) about historic and cultural issues, the communication of information, and to aid villages in the most efficient/helpful use of limited resources when dealing with the Army (and other federal agencies).	NOTED	-----
5	General -- Create SOP to cover a variety of educational items, i.e., within installation and without (in municipalities, museums, different information sources, within villages, schools).	Agree. Has been addressed as mitigation. Education is not covered by 36 CFR 800, so could not be a stand-alone programmatic SOP in the HPC. Instead, can plan an additional SOP that could become part of the larger ICRMP for the installation. (ICRMP can address other aspects of the cultural resources program beyond 36 CFR 800.) Suggestions are welcome.	See page 100, SOP 8.3.2
6	General -- Create SOP to cover curation in more detailed manner.	NOTED	-----
7	General -- Suggestion for Army presentation about the Alternative Procedures at a regional meeting— 15 minute presentation, poster, table with person and information.	NOTED	-----
8	General -- Want made clear how comments are	This document addresses how	See to pages

	included in drafts of HPC.	comments included in this draft of the HPC.	identified in this table. Changes made in <i><u>italics underlined</u></i>
9	General --Need more provisions for historic preservation and architecture in the HPC.	We need concrete suggestions about what these would be from stakeholders.	
10	General -- Make education programs a priority. This would include at least the garrison commander, DPW, and soldiers on post so that they appreciate the place where they are and are encourage to be stewards.	Not address by 36 CFR Part 800 which HPC is based on. Will be part of ICRMP	-----
11	General --There is a need for a better understanding of the NEPA process by interested parties.	Information will be provided at next round of meetings.	-----
12	General -- Desire expressed for interested parties and cultural resource staff to "sit on the same side of the table" in managing resources.	NOTED	-----
13	General -- Develop a research design for archeological properties and make an SOP for such.	NOTED An ICRMP issue and not HPC.	-----
14	General -- Suggested that might need to create new working groups concerning different resources such as one for archeology at Ft. Wainwright that would be comprised of various professionals and others with a vested interest in this area and these resources.	NOTED	-----
15	General -- It is currently unclear how one might go about finding out more about the Alternative Procedures process, particularly if one does not have the background and training necessary to dig through and understand the CFR or the Federal Register. A couple of pages explaining who does what, where responsibility and authority are vested, and where to go to find out more about a particular topic would be a big help. Such a document would probably be useful for anyone involved in developing Army Alternate Procedures, whether in AK or elsewhere. The Office of History and Archaeology staff might also benefit from receiving such a document.	Response: The AAP were provided to consulting parties during initial consultation about the process and training was provided to native villages about Section 106 and the AAP. More are available in hardcopy from USAG-AK and copies maybe accessed via the internet at http://www.achp.gov/AAPFinal6Mar02.pdf . This document contains information that defines participants and their roles, where authority is vested, and how the process works. More information may be obtained by contacting USAG-AK staff, the ACHP, or the AEC. (There will also be information available online on DENIX that is meant for installations.)	
16	General -- There does not appear to be any provision made in this document for the protection of fossils and fossil-bearing localities on Army lands. My understanding is that vertebrate fossil remains are included in some of the relevant federal legislation with which the Army is required to comply. How are paleontological remains being dealt with by Army Land Managers? The Antiquities Act and Alaska State law include paleontological resources along with Cultural Resources; Exclusion of these should be explicit in this document; although, personally, I think they should be dealt with in a somewhat similar manner to archeological resources.	NOTED Paleontological remains not addressed by 36 CFR Part 800 HPC only addresses how USAG-AK will meet its Section 106 obligations and replaces 36 CFR Part 800.	-----

17	General -- This publication contains several bibliographic citations. Where is the bibliography? How do we get access to documents cited here that are not generally available to the public (e.g., Hedman's report)?	HPC is part of the ICRMP. Bibliography will be found in the ICRMP	-----
18	General -- It would be useful to have a flowchart or other description for the relationship between various Army entities and how they relate to one another in this process. For example, if vandalism of a cultural or historical resource occurs on Army land, what is the process for reporting, investigating and prosecuting?	NOTED SOP provided in the ICRMP	-----
19	General -- We would also like to see the definition for "temporary building" to be refined. A building that has withstood the ravages of time for 50 or more years is hardly "temporary." Given the same standard new constructions built for the next 30 years whether built of concrete and steel still should be classified as temporary. After all the building may well outlive its usefulness well before that time.	NOTED	-----
20	General -- While it is easy with the stroke of a pen to condemn a building and perhaps more of a challenge to preserve a Sense of Place in the comparatively small landmark and historic district is certainly is doable.	NOTED	-----
21	General -- There was a discussion about CAs, MOUs, other agreements that would be useful in addition to the idea of sub-garrison HPCs.	NOTED	-----
22	General -- Make document language more user friendly	NOTED	-----
23	General -- Desire for process to move as quickly as possible based on (some) village representatives' perceived need for and value of the types of participation, interaction, ability to affect process offered by the HPC.	NOTED	-----
24	General -- Provide the various documents referenced in this document. Provide a summary in the HPC of what those documents are about.	NOTED	-----
25	General -- Want the impact of this document on minority populations analyzed and/or want this considered in all actions covered by this document.	Will be addressed in EA	-----
26	General -- Provide information to villages about museums, Preserve America program and other ways of securing different types of funding, funding for museum development, and loans of collections	<i>Preserve America</i> is a White House initiative in cooperation with the Advisory Council on Historic Preservation, the U.S. Department of the Interior, and the U.S. Department of Commerce. <i>Preserve America is a White House initiative that will provide you with greater support to protect and restore our nation's cultural and natural resources—from mountains and buildings to landscapes and main streets."</i> Laura Bush http://www.preserveamerica.gov/	
27	General -- Village members want a significant,		

	meaningful voice in decisions on mitigation.	NOTED	-----
28	General -- Suggested use of “cultural phenomena” as a covering term for many types of native Alaskan cultural “things”. Would include sacred sites, oral history/tradition, “sites of traditional religious and cultural significance”, TCPs, archaeological sites, etc.	NOTED	-----
29	General -- Need for definition of what lands fall under the HPC—need general maps at least.	Added	See Figure 1, Page 1
30	General -- Need IMPACT AREAS clearly defined both in terms of what they mean (and on maps?)	Added	See Figure 2 Page 2
31	General -- Can villagers go out onto Impact Areas under certain conditions? Request for feasibility inquiry.	Impact Areas are off limits and only accessible to authorized personnel.	-----
32	General --How does the curation of artifacts relate to Section 106?	NOTED Collection of artifacts is not always avoided in meeting Section 106 responsibilities. When collections are made, curation of the artifacts must be provided for. All artifacts collected will be curated in a certified museum.	-----
33	General -- How are “for profit” tribal entities dealt with?	As Interested Party	-----
34	General -- Clarify how the HPC relates to other legal documents.	How the HPC relates to other legal compliance documents is the same way that section 106 relates to these documents. The ACHP web site provides an overview of this along with the other laws (http://www.achp.gov/relationship.html): Relationship of Section 106 to Other Laws Federal agencies have responsibilities under a number of laws that may influence the way they carry out their Section 106 duties. Section 800.3 (b) of ACHP's regulations specifically encourages coordination of Section 106 responsibilities "with any reviews required under other authorities such as the National Environmental Policy Act, the Native American Graves Protection and Repatriation Act, the American Indian Religious Freedom Act, the Archeological Resources Protection Act, and agency-specific legislation." However, compliance with one or more of these other statutes does not substitute for compliance with ACHP's regulations, 36 CFR Part 800 , unless ACHP explicitly agrees that it does through execution of a Programmatic Agreement or approval of alternate procedures. Also, the regulations allow Federal agencies to comply with Section 106 through the use of the	-----

		<p>NEPA process and documentation, so long as the steps and standards of Section 800.8(c) of ACHP's regulations are met. Several of the other Federal laws related to the National Historic Preservation Act (NHPA) with which agencies must comply are: National Environmental Policy Act of 1969 (NEPA); Archeological and Historic Preservation Act of 1974 (AHPA); Archeological Resources Protection Act of 1979 (ARPA); American Indian Religious Freedom Act of 1978 (AIRFA); Native American Graves Protection and Repatriation Act of 1990 (NAGPRA); and Americans with Disabilities Act of 1990 (ADA). Agency-Specific Legislation</p>	
35	<p>General -- Programmatic Agreements, by definition, are to resolve potential adverse effects. There were numerous mitigation suggestions in the Stryker Brigade EIS, which need to be included as options. Flexibility needs to be provided to ensure the ability to use other strategies and mitigations that can result from creative problem solving. The ACHP website and office may be a source of resolution ideas, based on past agreements accomplished. Mitigation would require working it out with effected parties rather than making independent determinations.</p>	NOTED	-----
36	<p>General -- All references to professional criteria to be involved, supervise, manage, etc. need to state, "Tribes are excluded from these requirements due to their recognized special expertise and knowledge." It needs to be clear that "consultation" is more than simply discussing things. Tribes are to be consulted on the same level as a SHPO, which includes participating in decisions and working to agreement.</p>	NOTED	-----
37	<p>General -- There appears to be a focus on religious and cultural items. There needs to be an inclusion for other items and types of cultural resources important to the tribe. For instance, a simple place in its natural setting could be historical and be culturally significant. Tribes have important people too. Important regional history should include tribal histories.</p>	Added	See page 85 - 86
38	<p>General -- The current placement of the "tribal" sections comes across as if they are the last to be contacted, particularly in the SOP steps. Tribes need to be in the scope and planning stage wherever feasible, rather than last contacted. A statement that the placement of tribal matters in the last section is not intended to mean last contacted might work. A reference to the Tribal Section within various parts of the earlier section would help as well.</p>	<p>Mandatory SOPs required to meet Section 106 obligations appear first. Additional SOPs appear after the mandatory. Order in which they appear does not imply a hierarchy of importance.</p>	-----

39	General -- One on one sessions at the staff level (Tribes) may prove helpful in developing the procedures language. Thoughts and ideas can be bounced, processes that tribes are not familiar with can be explained, and language can be adjusted to ensure that it is understandable to both.	NOTED	-----
40	General -- The use of Dena'ina names in the document is a wonderful compliment. I never knew EAFB leased aircraft to the USSR. That was interesting. It doesn't say much more about it. Who to contact on base for what type of issue should probably be made clearer. Wetlands and rocky areas should not have exclusions.	NOTED	-----
41	General -- It appears that practically all the military activities will affect cultural resources. Perhaps there needs to be a standard and clear function of monitoring activities during progress, such as an archeologist presence. It would be important to tribes that extra steps are taken to reduce the disproportional negative impacts on their minority population. The destruction of historical and cultural records, places, and features is not only a loss to the tribe and its people. It is often felt as an emotional trauma and believed to diminish personal identity.	NOTED	-----
42	General -- Are we to agree to a development of processes that has not occurred? Does the development of processes to be done exclude tribal involvement? There are a number references to "programs" to develop. There are a number of references to activities that will effect or potential effect locations. Consultation provisions with tribes in the process are needed for when they know for sure that there will be an impact.	NOTED	-----
43	General -- There does not appear to be a process to involve tribes in "discoveries" found after the fact or learned of later, and during activities, what to do then. Existing management policies, procedures, and plans are mentioned that we were not involved in, including "best practices" that we have not agreed to. How can we agree on something we are not familiar with and have not participated in?	Procedures (SOP) are being prepared in consultation with Tribes and others during preparation of this HPC.	-----
44	General -- Many times an elder has stated that a certain place is where something happened or is where something we did -- he says -- that is history. Considering the small population Eklutna has in comparison to the rest of the populations here (after all these years), those little bit of histories are phenomenally important to the tribe.	Added	See page 59
45	General -- Annual reviews alone would interfere with the timelines allowed to respond or take action when a tribe	NOTED	-----
46	General -- Additional Matters: A notification and enter/exit process needs to be set up for land area changes, such as land acquisition or transfer. Tribes should be notified due to the impact on their interests, which could result from land changes. The Army should facilitate discussions with any new interest that may impact tribal concerns and educate	NOTED	-----

	transfer owners.		
47	General -- Notes about Interpretation of Terms: The Army has been using federal legal definitions when referring to subsistence while aware of tribes having a different perspective and interpretation of the meaning. For the Army to utilize tribal perspectives when addressing this subject, further discussion and perhaps even language development could occur. Otherwise, tribes often do interpret terms and statements differently. There should be no assumption that a statement is clear to all. Interpretations of this document, its contents and processes, and future discussion shall accommodate tribal perspectives.	NOTED	-----
48	General -- It is recommended that team language development with the Army be accomplished through one-on-one work sessions for those tribes that so to do so. This will help ensure the inclusion of procedures desired by any one tribe and should not exclude ideas and desires by other tribes, including consented modifications.	NOTED	-----
49	p. 1/Introduction: How will the Integrated Cultural Resources Management Plan be incorporated with the Historic Properties Component?	The HPC is the part of the ICRMP that addresses how USAG-AK will meet its Section 106 obligations. The remainder of the ICRMP addresses other than Section 106 issues such as ARPA and NAGPRA.	-----
50	p. 1 line 9. Kink Arm should be Knik Arm.	Corrected	See page 1, line 7
51	p. 1 line 14. Delta Junction is located 100 miles SOUTHEAST of Fairbanks.	Corrected	See page 1, line 12.
52	p.2, line 1 Should read (NHPA) of 1966 as amended	Corrected	See page 2, line 6
53	p.2, line 11 – revision should be changed to amendment	Corrected	See page 2 line 16
54	p.2, lines 17 and 18 – you may want to add the Federal Register citation for the Council's regs	Citation is 36 CFR 800.	See page 3, line 23.
55	p.2, line 18 – citation should read 36 CFR Part 800 rather than 36 CFR 800	Corrected	See page 3, line 23
56	p. 3, line 17 – use a paragraph symbol between CFR and 800.14	Corrected	See page 4, line 25
57	p. 3 line 5. What is meant by "promote their rehabilitation and adaptive reuse"?	The Cultural Resources program will identify rehabilitation and adaptive reuse as the preferred option for historic properties in the discussion making process.	-----
58	p. 3 line 11. This in an assertion of opinion and does not belong in the document.	NOTED	-----
59	p. 4 line 14. APP should be AAP.	Corrected	See page 4, line 28
60	p. 4 line 17. It would be useful to have clarification about what these unspecified executive orders are and what they do.	<p>The executive orders are as follows below and they are hot linked to AEC web site with text that explains each.</p> <ul style="list-style-type: none"> • EO 11593 Protection and 	

		<u>Enhancement of the Cultural Environment</u> <ul style="list-style-type: none"> • <u>EO 13006 Locating Federal Facilities in Historic Properties in our Nation's Central Cities</u> • <u>EO 13007 Indian Sacred Sites</u> • <u>EO 13175 Consultation and Coordination with Indian Tribal Governments</u> • <u>EO 13287 Preserve America</u> 	
61	p. 4, line 9 – should read under “the” AAP (look for this throughout.	Corrected	Through-Out
62	p.4, Section 1.2.3 – you may want to add a discussion here that informs the reader that stakeholder consultation, through the AAP process is done during the development of the HPC. Upon approval of the HPC by ACHP, no further ‘formal’ consultation is done with consulting parties unless the HPC is amended or until it is recertified. Consultation with tribes during implementation of the HPC results from other requirements outside the AAPs.	Added	See page 5, lines 7-11
63	p. 4/1.2.3: Is it Preservation or Properties in HPC? Please provide a listing of all applicable federal laws and Army regulations.	Properties – NOTED	-----
64	p.5, line 3, neither the AAPs nor 36 CFR Part 800 use the term “interested parties”. You may want to change this term throughout the document since it was previously used in the Council’s regs. Using it may cause some confusion.	Changed	Throughout
65	p.5, Section 1.2.4 – this section should be expanded to add more detail on the NEPA process. This will help the reader understand some of the NEPA process in later sections.	NOTED	-----
66	p.5 – NEPA has project driven timelines. Alternate consultation procedures would facilitate timelines driven by issues deemed import by the parties, not necessarily with development being the objective. For example, restoration of a site might be deemed worthwhile without impending site destruction by a project.	NOTED	-----
67	p.5, line 19 – should say that “this component summarizes the categories of undertakings...” It is not a list of projects, only the types of projects commonly done on the installation.	Changed	See page 6, line 19
68	p. 5, 1.2.5/line 12: Organizational Elements of the H.P.C. this is where the first mention of the idea that: historic and cultural resources that will be impacted should have a separate and involved track; non-historic and non-cultural resources should have a stream led process [bargain point to archive other historic interests]. See page 53/lines 22-23.	NOTED	-----
69	p.5, lines 21 and 22 – expand this section to discuss both categorical exclusions and exempt	Expanded	See page 6, line 22-25

	undertakings and describe the difference per the AAPs.		
70	p.8, Section 1.3.2.2 – a map here would help.	Done	See Figure 2
71	p.11, Section 1.3.3.2 – complete the table and again a map would help	Done	See Table page 12 and Figure 3
72	p. 11 Table is missing numerical data.	Done	See Table
73	p. 11, Line 9 - Fort Wainwright's acreage is 1,559,000 not 61,000.	Corrected	See page 19, line 1
74	p. 11, Line 14 - should read "Fort <u>Wainwright's</u> training facilities", not "Fort Richardson's facilities".	Corrected	See page 19, line 1
75	p. 11, Line 18 - <u>Manchu</u> not Manuch	Corrected	See page 19, line 5.
76	p. 13-16/Tenant Units: Are these tenant units and organizations the same for both Fort Richardson and Fort Wainwright?	Most are. Those that are, are under the USARAK or USAG-AK headquarters but with their own directorate.	
77	p.16 – are the agencies and offices on this page tenants? You may want to explain how they differ from the previous office that are Army.	NOTED Identified as tenants on page 13 of draft discussion document	-----
78	p. 16 -- BLM's role appears to be limited to fire suppression; I am under the assumption that it has a larger role. This should be made clear.	USAG-AK has the lead in meeting Section 106 obligations for Army undertakings. BLM does not have a role in USAG-AK's meeting its Section 106 other than as an interested party.	-----
79	p... 17 line 22 USAG-A should be USAG-AK.	Corrected	See page 22, line 2
80	p.18, line 9 – should read staging area not staging are.	Corrected	See page 25, line 8
81	p.19, line 6 – delete "on".	Deleted	See page 26
82	p.19 and 20 – complete the table.	Done	See Tables, page 26-28
83	p. 19 lines 5 and 6. Delete the word "on".	Corrected	See page 19 lines 5 & 6
84	p. 19 lines 8-9. Regardless of whether some areas are more heavily impacted by training activities than others, those activities that have potential to impact eligible sites must be addressed in this process.	NOTED	-----
85	p. 19 Table is missing data. What do the letters in the table refer to?	Done	See Table
86	p. 20. Ditto.	Done	See Table
87	p. 20 line 8 delete "on".	NOTED	-----
88	p. 20 line 9 delete "at"	Corrected	See page 20, line 9
89	p.20, line 9 – delete "on"?	Deleted	See page 20, line 9
90	p.20, line 10 – delete "at".	Deleted	See page 20, line 9
91	p.21, line 9 – should read projects not project. Also delete historically.	Corrected	See page 28, line 20
92	p. 21 line 7. Whether such disturbances are absolutely necessary or not is irrelevant. If they have potential to disturb potentially eligible sites, then those sites must be located, assessed, and	Deleted	See page 28

	possibly mitigated prior to LRAM activities being undertaken.		
93	p. 21 line 19-20 is unclear.	Clarified	See page 28,
94	p. 21 line 25. Which initiative does this statement refer to?	"Outdoor Recreation" under the introductory sentence.	See page 29, line 14
95	p. 21 "Cultural and natural resource management are administered jointly by the Natural Resources Branch, (and?) Public Works." Again, what about BLM?	Corrected	See page 29, line 7-8.
96	p. 22 lines 6-8. Statement is too vague. How specifically will these potentially conflicting needs be balanced, and how will the process and SOP we are developing come into play?	NOTED GC now addressing	-----
97	p. 22 Section 1.4.2.3. Road construction and improvement needs to be specifically addressed in this section.	Added	See page 30, line 27
98	p.22 - 1.4.2.3 Activities Likely to Affect Archaeological Sites and 3.2: Off-Road Maneuver as a Categorical Undertaking. Off-Road Maneuver: The language about winter usage is too general. Even on the northslope, winter activities can result in damage to archaeological sites. In the interior and southern Alaska, winter includes many periods with negligible snow cover and relatively warm temperatures, when conditions do NOT protect surface or even subsurface sites from impact.	Clarified	See page 30 line 18
99	p.22, line 1 – if this section is identified here as a potential negative impact to archeological sites, then it shouldn't be considered as an exemption on p. 66.	ADDRESSED	See page 30
100	p. 22/1.4.2.2 Spill Response: Include the National PA for FOSC's responding to Oil and HAZMAT Spills/Alaska Implementation Guidelines.	NOTED	-----
101	p. 23/1.4.2.4 Activities likely to Affect Standing Structures; Infill construction in-or adjacent to-a historic district also has the potential to affect standing structures. How are the requirements of AR 200-4 related to the procedures for demolition established by the ACHP? How and where is AR 200-4 incorporated into the HPC?	The Council does not have procedures for demolition. They are related to the extent that AR 200-4 sets forth Army policy which necessarily must be followed in the AAP. The AR 200-4 encourages Programmatic Agreements which the AAP are certainly. Also, such things as staffing procedures in AR 200-4 must be followed in the AAP. Also, see text below from AAP in Fed Reg. <i>(c) Relation to internal Army Regulations.</i> Army Regulation 200-4 "Cultural Resources Management" (AR 200-4), an internal agency policy sets forth the Army's requirements for complying with the act, the Archeological Resources Protection Act (ARPA), the Native American Graves Protection and Repatriation Act (NAGPRA), the American Indian Religious Freedom Act (AIRFA), Indian Sacred Sites under Executive Order 13007 (Indian Sacred Sites), Executive	

		<p>Order 13175, (Consultation and Coordination with Indian Tribal Governments), and 36 CFR Part 79 (Curation of Federally-Owned and Administered Archaeological Collections). The cornerstone of AR 200-4 is the policy requirement for all installations (other than those receiving a variance) to prepare an Integrated Cultural Resources Management Plan (ICRMP). The ICRMP integrates the entirety of the installation cultural resources program with the ongoing military mission, allows identification of potential conflicts between the installation's mission and cultural resources, and identifies actions necessary to meet statutory and regulatory requirements.</p> <p>(d) These procedures utilize to the maximum extent possible existing internal Army program requirements to meet section 106 requirements. Each ICRMP developed by an installation shall have a Historic Properties Component (HPC) to ensure compliance with section 105 of the Act on a programmatic, as opposed to project-by-project, basis. Individual installations shall coordinate with internal staff elements, consult with consulting parties, and, where appropriate, consider the views of the public, on development of the HPC to ensure that the HPC includes adequate procedures for identification, evaluation, and involve consulting parties on development of the HPC, not the entire ICRMP, since other components of the ICRMP involve management of cultural resources beyond the statutory and regulatory authority and jurisdiction of consulting parties. Neither these procedures nor a certified HPC relieves the Army of its responsibilities to comply with other cultural resources laws such as NAGPRA and ARPA.</p>	
102	p.23, line 6 – you should describe the less impacts of this activity within the cantonment areas, otherwise it contradicts using this as an exemption on p. 66.	Clarified	See page 30, Line 22
103	p. 23 line 3. Statement that off road activity by tracked vehicles in winter has a low potential for impacting sites is an unproven assertion. As such it has no place in this document. As noted by Pete Bowers in our meeting, BLM has developed specific guidelines for winter vehicle use in NPR-A. These might serve as an appropriate model.	Changed	See page 30 Line 15

104	p. 23 line 15. Does the JAG agree? How and when will this be done?	Conservation Enforcement looks for ARPA violations and will pursue criminal prosecution in coordination with SJA	-----
105	p. 23 lines 17-20. What role does consideration of historic values have in the process of deciding whether to demolish or not?	SOPs outline process for consideration. In reality, it is budget constraints that can direct decision to demo since budget process does not easily support rehabilitation over demolition and replacement.	Page 30 Line 37
106	p.23, line 17 – what are these “procedures for demolition”? ACHP, in its regs uses demolition as an example of adverse effect, but we don’t have specific procedures for demolition.	Struck. ACHP does not have procedures for demolition	See page 30 Line 37
107	p. 25 -- Section 1.5.2 Internal Installation Organization -- “The CRM is also responsible for coordinating with the public and the two primary partners for cultural resources management, The Alaska SHPO and the Advisory Council.” That statement should include tribes. According to 106 guidelines, Tribes AND the SHPO are to be contacted. Also, Tribes are entitled to all the same information that the SHPO has.	Tribes can be included when they attach religious and cultural significance to identified historic properties – otherwise SHPO and Advisory Council primes.	Page 32
108	p.25, line 8 – shouldn’t this read Cultural Resources Manager rather than Managers?	Corrected	See page 32, line 12
109	p.25, line 16 – this section describes the CRM. Throughout the document the term CRM is used to identify activities, duties, and work to be accomplished. I’m not sure the CRM (the person) can accomplish everything that’s laid out in the HPC. You may want to find a way to clarify when the CRM will personally be doing certain things and when the CRM’s staff may be doing these. For example, later in the text the CRM is responsible for writing scopes of work for contracts. I assume that scopes will actually be prepared both by the CRM and staff.	NOTED	-----
110	p.25, line 24 – there should be a period after Advisory Council and “as” should be capitalized.	Corrected	See page 32, line 17
111	p. 25 line 9. Managers? This is the first mention of multiple CRMs. Is this a typo? Please clarify.	Corrected	See page 32, line 13
112	p. 25/1.5.1 USAG-AK: What are the responsibilities of the Deputy Assistant Secretary of the Army (Environment, Safety and Occupational Health) (DASA(ESOH)). The Assistant Chief of Staff for Installation Management (ACSIM), the Judge Advocate General (TJAG), the Director, Army National Guard Bureau (ARNGB), MACOM Commanders; Commander, U.S. Army Reserve Command,; and Director of Environmental Programs, National Guard Bureau (MACOM commanders), Installation Commanders; Commanders, of US Army Reserve Regional Support Commands; and the Adjutants General ((Installation commanders) under the HPC? Are they altered in any way from their responsibilities under AR 200-4? AR 200-4 recognizes the Installation Commander as being responsible for compliance, not the Garrison Commander.	NOTED Installation Commander is the Garrison Commander	-----

113	p. 25/1.5.2 Public Works/Cultural Resources Manager: What's the difference between a Cultural Resources Specialist and a Cultural Resources Manager? Are their professional qualifications the same? Where are they listed? Why are you making a distinction here?	Corrected	See page 32,
114	p. 25 -- The CRM coordinates with the public and the two primary partners, SHPO and Advisory Council. Again, what about BLM?	BLM has and continues to be involved in consultation in preparing the HPC as interested parties. Robert King and Donna Redding have been active participants. Howard Smith is invited to all meetings and provided drafts for comments.	-----
115	p. 25 -- It should be noted that the CRM is more of an office, rather than a person; i.e., Russ Sackett will not always be the CRM. Additionally, there are subordinates who accomplish the actual scoping, determinations, etc. in the name of the CRM for the different installations or parts of installations.	NOTED	-----
116	p. 26 line 19. Where does the Provost Marshal sit within the organization? JAG?	Provost Marshal is own entity as identified in text.	-----
117	p. 26 line 25. EDIT/Proof read.	Corrected	See page 33
118	p. 26 top -- Tribes should be mentioned as an initiator of consultation and a primary partner for cultural resources management.	Section addressed internal process	-----
119	p.27, line 7 -- should read "...desire for participation in the development and implementation of..."	Corrected	See page 33, lines 25
120	p. 27-28. Need a revised list of interested parties.	Requires further assistance from stakeholders.	See pages 34 -- 35
121	p. 27-28 --It is unclear how the Army has gone about identifying and contacting "stakeholders" or "interested parties" beyond those it is required to invite to participate in this process because of their legal interest in Army Lands (e.g., SHPO, Tribes, BLM, NPS). The ultimate success of the AAP will depend heavily on the commitment of stakeholders to volunteer their time and talents. Whether based in reality or not, the appearance is that the Army has taken an "only include the people we are required to include" approach. Individuals and organizations whom I believe should have been included apparently have not been contacted. Two such examples are the Alaska Anthropology Association and the Alaska Historical Society. Both organizations maintain mailing and email lists, and an active membership with a strong interest in cultural and historical resources. Both would be willing to notify their members about the opportunity to participate. In my view, both organizations should have organizational representation in this process. It would be useful to have an informational session on this process and the procedures being developed at the annual meetings of each of these organizations.	Requires further assistance from stakeholders.	See pages 34-35
122	p. 27-28 -- Suggestions were made for others to be on contact list including elders' groups and regional	Requires further assistance from stakeholders.	See Pages 34-35

	entities. Village members will provide names and addresses.		
123	p. 27/8 The list of Native Tribal contacts is unrealistic; e.g., what does e.g., Alatna or Lake Minchumina have to do with the region under discussion?	NOTED	-----
124	p. 28 line 28. University of Alaska Museum, not University of Alaska Fairbanks Museum.	Corrected	See page 35, line 15
125	p. 28 line 29. Doyon	Corrected	See page 34, line 28
126	p. 28: Add Alaska Anthropological Association and others.	Added Requires further assistance from stakeholders to identify others.	See pages 34-35
127	p. 28 -- 2.0 - PLANNING LEVEL SURVEY -- Provided that there are no additional ground disturbances -- language is needed. Maintenance could impact tribal cultural resource areas, depending what is done.	NOTED	-----
128	p. 29 -- Section 2.1 Exclusion of Sensitive Site Information. It must be made clear that tribes are entitled to all the same info that the SHPO has and is given. An agreement to exclude tribes is contrary to tribal rights.	Clarified	See page 36, lines 18
129	p.29, line 5 -- states that the PLS is "presented elsewhere" and yet the next page (line 7) says it is in appendix 1. Please clarify.	NOTED HPC part of ICRMP	-----
130	p. 30 -- Section 2.2. Inventories, Fort Richardson -- Chief Ezi's historical land claim included claims to the land where Fort Richardson is. Chief Alex had also filed some claims, which may overlap (a traditional tendency). It seems that those things are important and it is suggested that they be included. That will help establish the relevancy of tribal involvement in this document. There needs to be flexibility for categorizing Tribal cultural resources so that they do not fall through holes just because it may not have archeology remnants for example.	NOTED	-----
131	p. 30 lines 1-3. The process for gaining access to this information must be clarified.	Clarified	See page 37, lines 3-4
132	p. 30 line 21. If material has been excavated it is the property of the federal government. Has material been excavated, and if so, where is it?	None collected	-----
133	p. 30 Ft. Rich archeology. Seven sites...six determined eligible...the remaining two....Doesn't add up	Corrected	See page 37, line 20
134	p.31, line 14 -- you may want to say that Eagle River flats is an active impact area "for mortar and artillery fire".	Added	See page 38, line 14
135	p.31 -- Disagree with the acceptability of dismissing archaeological investigation and protection of cultural sites, to allow bombing Eagle River mouth and Flats.	Noted	-----
136	p.31, lines 16 & 17 -- Therefore the (which?) latter three areas are primary locations of concern with	Clarified	See page 38, lines 16-17.

	<p>regard to undiscovered archaeological sites. Generally, this is a good acknowledgment for the wetlands and forest border probably referenced. What potential solutions do we have to address this problem?</p> <p>Add – the parties should cooperatively investigate strategies/methods to assess, manage, and protect cultural resources throughout these currently excluded zones.</p>		
137	p.32 – These areas should be considered for assessment and prioritization, especially when DOD projects are planned which might impact them. Further predictive modeling, using methods including those from which this information was derived, should be done under agreement with Alaska Native Tribes.	NOTED	-----
138	p. 32 line 10. Improper citation of AHRs number. Needs a quad designation.	Corrected	See page 39 lines 9-10.
139	p. 35/22.2.2. Fort Wainwright Archaeology: Is there a draft ICRMP-or an outline for the ICRMP? Please provide a copy for review during further development of the HPC.	ALL PARTIES HAVE BEEN PROVIDED COPIES	-----
140	p. 35 References??? Does the CRM really have a list of references?	Yes	-----
141	p.36, Section 2.2.2.2 – you may want to include the percentage of Tanana Flats that has been surveyed and whether any areas need resurvey since some of the efforts go back to 1973.	Made Comment	See page 42 Lines 16 –19
142	p. 37 lines 9-13. What provision will be made for addressing the almost complete lack of understanding of archaeological and cultural sites in Donnelly West?	NOTED	-----
143	p. 38/Para.2: Paragraph 2, line 2 notes 25 contributing buildings and structures to Nike Site Summit-Table 13 Appendix 1 lists only 15-please verify the correct number.	Corrected	See Appendix 1, Table 13 Page 44
144	p. 38/Para. 2: Paragraph 2, line 6 through 9 – the identification and evaluation of National Register [of Historic Places] eligible properties relate to the Cold War Era is still under consideration.	NOTED	-----
145	p. 39/Para. 1: Paragraph 1, Line 1 notes 70 contributing buildings and structures to the historic district-the table in the Appendix lists only 66-please verify the correct number.	Corrected	See page 45 Line 1
146	p. 39 line 21. Stating that surveys will be conducted as funding permits is not appropriate here. Federal law holds that up to 1% of construction costs – which I would argue includes the activities being undertaken to support the change in mission as well as construction of the missile defense system – can be used to pay for cultural resource management. The Army must comply with existing federal law.	NOTED	-----
147	p.39, Section 2.4 – You state that identifying and managing properties of traditional religious and cultural significance is an important future focus.	NOTED	See page 55 and 56; Section 5.1.1.2

	Should this also be included in the section on desired future conditions?		
148	p. 40. -- Section 2.5 Fort Richardson: Archaeological Resources -- The tribe would like more information so as to/and contribute to the scheduling of reconnaissance and other surveys. Also, what is an "irreplaceable biological and cultural resource" in this document?	Made Comment	See page 45 Line 25 and Page 46 Line 4
149	p.40, line 5 – and evaluation?	Added	See page 46, line 11
150	p.40 – More cooperative effort and consideration on our part, in development, is needed to sign off on specific priority areas. For example, we have not yet access Fort Rich's archaeological GIS data. We hope more areas will be prioritized, at least for gathering of traditional knowledge from, and scoping for more intense survey. We must take advantage of their knowledge while they are still with us and energetic.	NOTED	-----
151	p.40, line 13 – if you are having some shoreline erosion problems you may want to physically mark the shoreline to develop a trend for erosion. In 2005 and out years you could monitor the trend, and may want to stabilize shoreline at some point in the future.	NOTED	-----
152	p.41--2.5.1.2 Fort Wainwright Archaeological Resource: Line 24: presumably AK Native Tribes were inadvertently left out of this list of parties to consult?	Added	See page 47, line 22
153	p.41, line 21 – again, survey and evaluation?	NOTED	-----
154	p. 42 Evaluation should not be restricted to sites as previously found and reported upon. Birch Hill should include further survey and test excavations. It was not done in a very thorough manner in the first place. The same is true of Blair Lakes and Clear Creek Buttes. Only parts of these areas were surveyed and <u>very</u> limited test pitting was accomplished.	Made comment. Ties in with comment 148.	See page 47 Lines 17 – 19
155	p. 43 lines 25-26. Who will conduct these re-evaluations? How will they be done? What processes for consultation will be in place?	INTERNAL or through Cooperative Agreement. HPC's SOPs	-----
156	p.44 – this annual inventory section discusses archeology and historic buildings, but it says nothing about properties of traditional religious and cultural significance. Is there a schedule for identifying and evaluating these resources?	NOTED	See page 55 section 5.1.1.2, line 21
157	p.45, line 23 – are any historic properties designated as protection areas or are these all biological? If these are biological protection areas, are there any plans to use this method for archeological properties.	Archaeological sensitive areas	-----
158	p. 45. Road construction and improvement should be categorized as an undertaking itself.	Incorporated in 3.4 Construction	See page 51, line 12-13
159	p. 45/3.0 Categorized Undertakings: Other undertakings that are not listed here are known to have an effect on historic structures-transfer of ownership, leasing, sale, emergency repair	NOTED	-----

	procedures and change of use. Can these undertakings be acknowledged here?		
160	p. 46/3.5 Demolition: What are the procedures established by the Advisory Council? Where will they be published for reference by Army cultural resource management personnel and consulting partners? What about the procedures related to the demolition of historic procedures required by AR 200-4 and Department of Defense Instruction 4715.3? How will they be included in the HPC and ICRMP?	SOPs of HPC will define these procedures.	Page 51 Line 16
161	p.46, Section 3.3 – You may want to describe tree removal in more detail. Are these cut off at ground level and dragged out, are they pushed over, are they snagged out?	Added	See page51
162	p.46, Section 3.4 – This section makes it sound like construction will only happen if the military mission changes. Aren't there instances of construction under the current mission?	New construction is linked to change in space requirements associated with some level of mission change.	Page 51
163	p.46, line 22 – see previous comment on ACHP procedures for demolition.	NOTED	Page 51
164	p. 47. -- Section 3.7. We are not certain that re-vegetation and the like would not affect tribal cultural resources.	This is acknowledged as a possible adverse affect.	Page 52
165	p. 47 section 3.7. How will these be addressed?	Clarified	See page 52, lines 8-9
166	p.47, Section 3.7 – the description of adverse impacts here seems to contradict the exemptions section.	NOTED	-----
167	p.48 -- Need screening procedure to ensure that process for deciding categorical exclusions is appropriate.	NOTED Addressed in SOP 2	-----
168	p. 48 line 23. Inclusion of the term “mission considerations” is not acceptable. If a mission has potential to impact sites, it must be included in the process we are developing.	Struck	See page 53, line 23-24
169	p.48--4.2 Areas Exempt from Archaeological Inventory and SOP 2.2: Wetlands: Again, language is too general. Need to define wetlands for the sake of archaeological resources, since fresh water sources are an important factor in site locations. For archaeological purposes, a low potential wetland is saturated, swampy ground with standing water. For Wetlands research purposes, wetlands are much more broadly defined, and include areas of very high site potential. Cantonment/Developed Areas: Has the Fort Richardson cantonment area received any subsurface testing? It is possible that subsurface materials could remain depending on depositional history, etc. If no testing or other forms of evidence have been gathered to check this assumption, they should be. (if they have, this should be stated).	Addressed	See page 53, line 23, page 54 and Page 67
170	p. 48-50 and p.65-67 --Remove wetlands and other “write offs” from categorical exclusions in SOP 2, <i>particularly 2.2</i>	Wetlands Struck	See Pages 54-55 and 68
171	p.48, Section 4.0 – this section should also include	NOTED	-----

	Exempt undertakings. You may want to discuss the difference between these two – i.e. exemptions are Army-wide and have been established in the AAPs and categorical exclusions are negotiated with stakeholders during development of the HPC.		
172	p.48, Section 4.1 – should be titled Army-wide Exemptions. At the end of this section, you may want to mention the WWII temps programmatic agreement and the program comment for Capehart and Wherry housing as examples.	NOTED	-----
173	p.48, line 25 – Impact areas should be part of section 4.1.	Added	See page 53 Line 11
174	p. 48/4.0 and 4.1 Categorical exclusions: Is the proper term to use categorical exclusions, Army-wide exclusions or Army-wide exemptions? Please use consistently and define the difference between each term. When you use the term exemption or exclusion, make it known what exactly they will be exempt or excluded from.	NOTED Exempt Undertakings is the larger covering term for both categorical exclusions defined in consultation with stakeholders and those that are listed in AAP section 4.5.	-----
175	p. 48 What is a “Program comment” and why should such undertakings be exempt?	Response: 36 CFR Part 800 allows federal agencies to “request the Advisory Council on Historic Preservation to comment on a category of undertakings in lieu of conducting individual reviews under Secs. 800.4 through 800.6.” (36 CFR 800.14(e)). A category of undertakings can be defined (i.e., any actions to a certain kind of Army housing, for instance) and an expedient plan of action can be devised by a Federal Agency with the Advisory Council to avoid project-by-project review of each undertaking. Instead, a predetermined standard method of mitigation would be agreed upon between the Federal Agency and the Council upfront. Before any Program Comment is issued there must be an opportunity for the public to review and comment on the proposal. Program Comments are exempt in the HPC because they are Army-wide actions that have been agreed upon by the Council and therefore are not negotiable at the installation level. The AAP specify that this will be part of the HPCs for all installations.	-----
176	p. 48 -- 4.0 - CATEGORICAL EXCLUSIONS -- There should be mitigation to make up for losses to the tribes. It might be noted that the '64 earthquake dropped whole buildings (in-tact) below ground level in Anchorage and could have done the same on base. We do not agree that Land Management Undertakings would have o effect on cultural resources. There is a reference to Fort Richardson and Army regulations but does not name them.	NOTED	-----
177	p.49--4.3 Undertakings under INRMPs and SOP	Addressed	See page 54

	2.4: Outdoor recreation: can lead to increased access and intentional vandalism. Timber harvests: CAN have definite impacts on archaeological sites-what is meant by this term? Proscribed burns: can have impacts on both archaeological and historic sites.		Lines 21-23, lines 19-20
178	p. 49 lines 2-5. It is inappropriate to exclude lake margins from consideration. While they may have standing water now, the water level has varied considerably over time. Water logged sites are some of the most potentially significant ones out there.	Struck	See page 54, lines 15-16
179	p. 49 line 26. You cannot stipulate that these natural resource management activities will have no effect on cultural resources.	Clarified	See page 54, lines 21 - 23,
180	p.49, line 2 – integrate the changes that were made in SOP 2.4 here.	Corrected	See page ?
181	p.49, line 13 – you may want to reference SOP 12.3. emergency action.	Added	See page ?
182	p.49, line 20 – states that the listed management activities will have “no effect” on cultural resources. Couldn’t some of the listed activities have minimal adverse impacts?	NOTED	-----
183	p.50, line 5 – ordnance disposal doesn’t fit under natural resources management, does it?	Corrected	See page 54, line 5
184	p. 50/4.4 Maintenance and Repair of Historic Buildings: Maintenance and repair procedures that have the potential to have an adverse effect on historic buildings should not be included as categorical exclusion unless they are necessary to mitigate an imminent threat to human health and safety.	NOTED	-----
185	p. 51/5.1, 5.1.1.1 and 5.1.1.2 Desired Future Condition: What do you mean by, desired future condition? What about protection of eligible sites? Why isn’t management a desired future condition listed for archaeological sites-it is for properties of traditional religious and cultural significance? Why not archaeological sites?	Addressed	See page 55
186	p.51 -- 5.0 - MANAGEMENT GOALS AND PRACTICES -- Section 5. Streamlining should include tribal decisions on what is important. What are “Internal” stakeholders? It is not clear if “confidential” information would be given to contractors and subcontractors. We agree that use of Cooperative Agreements with Alaska Tribes in managing cultural resources on USAG-AK managed lands should be done. Are there other goals that could be added?	Internal Stakeholders are within Army. Confidential information will be controlled by the CRM. Only information necessary for the contractor to meet contract obligations will be provided.	-----
187	p. 51--5.1.1.1. Desired Future Condition of Archaeological Sites: In addition to the need to inventory as a first step, this paragraph should state the other goals of the program. Is not preservation of our heritage and management of resources the overall goal?	Made comment. Ties in with comment 188	See page 55 Line 12
188	p.51, section 5.1.1.1 – Is there any need for monitoring as a future condition?	Made comment. Ties in with comment 187	See page 55 Line 12
189	p.52, line 18 – you state adaptively reusing them to	NOTED	-----

	the maximum extent possible. Could you change this to be “maximizing their adaptive re-use? I think its sounds less negative and more like a management goal.		
190	p. 53 line 25. change public awareness to “education of both military and non-military personnel”.	Changed	See page 57, lines 28-29
191	p.53, line 12 – causing the least impact also could be replaced with “treatment of cultural resources in ways that meet USAG-AK’s military mission.	NOTED	-----
192	p.53, line 13 – have we defined what is meant by a cultural landscape approach?	Definitions vary. Staff is researching guidance from NRHP, AEC and other sources to develop a definition and approach appropriate for military lands. This could be presented for discussion at next review meeting.	-----
193	p.53, line 15 – could we also add re-inventory and re-evaluate as necessary?	Added	See page 57 Line 15
194	p.53, line 18 – historic?	Corrected	See page 57, line 18
195	p. 53, 5.2/line 10: Add-Use Fairbanks North Star Borough covenants easements, and historic preservation plan, see page 54/line 1 USA will consider us.	NOTED	-----
196	p. 53, 5.2/line 10: Maintain same historic protection as 36 [CFR] Part 800.	NOTED	-----
197	p.53 – Objectives 1 st bullet mod – Meet or exceed federal laws and regulations governing the beneficial treatment of archaeological resources while causing the least impact to the military mission. Add – Modifications to these AAP procedures will be negotiable through consultation at any time that this objective is found unsupported by the procedures. Bullet 3 – Inventory potentially significant cultural resources and evaluate for eligibility to the NRHP.	NOTED NOTED	----- -----
198	p. 53/ 5.2 Objectives/line 8: Include historians and historic architects?	NOTED	See page 57, 4 th bullet (lines 17-19)
199	p. 54 BLM responsibilities. This should have a high priority. It may have considerable impact of the final Alternate Procedures document.	NOTED	-----
200	p.54/5.2 Objectives/line 1: Request and consider the opinions of outside interests.	Added	See page 58, line 31
201	p. 54 line 10. Add NPS to this list. Don’t they have responsibility for NHLs?	No, Not as being discussed here. Because of status of land withdraw; USAG-AK and BLM have over riding responsibilities outside of cantonment areas. USAG-AK, however, is lead in meeting Section 106 obligations in USAG-AK undertakings. BLM is lead in meeting Section 106 obligations when undertaking is not a USAG-AK action.	-----
202	p. 54--5.3.1 Qualifications of Professionals: Since the AAP proposes a system whereby the Cultural Resource Manager is solely responsible for determining eligibility, assessing effects and	NOTED Staff currently meets this standard.	-----

	deciding on mitigation, this person needs more experience than is included in the Secretary of Interior's standards. These standards assume that the individual in question will be drafting materials that will be reviewed, at minimum, by the SHPO's office (and the SHPO review of DOEs includes at least two different professionals in that office). The Secretary of Interior's Standard are still applicable to the staff running inventory and evaluation surveys, etc., but NOT to the Cultural Resource Manager. This individual should have a minimum of five years of experience IN ALAKSA, and in both historic and prehistoric projects. Preferably they should have some level of training in both archaeology and architecture. SOP 4.2 Evaluation is a very well written summary of why the person making this decision (without any external review) needs a great deal of experience and judgment.		
203	p. 54 -- Desire expressed for a Cultural Resource Manager at USAG-AK who is qualified in both architecture and archaeology so that both kinds of resources are appreciated and managed well.	NOTED Staff currently meets this standard.	-----
204	p.54, line 1 -- you state that you are going to "consider outside interests". You may want to add that this will be done early in the planning stages of a project.	Added	See page 57 Line 32
205	p.54, line 3 -- do you want to say something about timeliness?	Addressed	See page 57
206	p. 54 -- Qualifications: make explicit that Sec. of Interior's Standards for personnel do NOT apply to native Alaskans. Make explicit that tribal members possess special knowledge and skills that are necessary for identifying, managing, working with cultural phenomena.	States that these are to be developed.	Pages 57 -- 58
207	p. 54, 5.3.1/line 22: and notify SHPO of staff changes; maybe as a SOP	In Annual Report	-----
208	p.54 -- last bullet mod -- and p. 111 -- Develop and use Cooperative Agreements, MOUs, SOWs, and other partnership arrangements to work with appropriate effort parties, including Alaska Tribes and stakeholders, in assessing and managing cultural resources.	Struck "Cooperative"	See page 57, line 12
209	p.55 -- Add -- Tribes will authorize qualifications for their participants in AAP activities.	Suggested wording added	See page 58, lines 1
210	p.56, line 20 -- here you discuss the evaluation of properties of traditional religious and cultural significance, but have we mentioned previously anything about inventorying these resources?	Yes. See 5.1.1.2 Properties of Traditional Religious and Cultural Significance	-----
211	p.56, Section 5.3.2 -- Is this a good place to mention the place name study that has been mentioned in the tribal meetings several times now?	Added to Section 5.3.3	See page 60 Line 37
212	p. 56 line 15. Stating that compliance with this agreement and existing federal law will be conducted as funding permits is not appropriate here. Federal law holds that up to 1% of construction costs -- which I would argue includes the activities being undertaken to support the change in mission as well as construction of the	NOTED	-----

	missile defense system – can be used to pay for cultural resource management. The Army must comply with existing federal law.		
213	p. 56 line 22. What is a cultural landscape approach? This needs to be defined in much greater detail and its implications for this process discussed.	In development. See comment 192.	
214	<p>p. 56/5.3.2 Programs: Army programs to evaluate the eligibility of archaeological sites, historic buildings, structures and objects; and properties of traditional religious and cultural significance for the National Register [of Historic Places] must be implemented in consultation with the Alaska State Historic Preservation Officer on a case by case basis through procedures established within the HPC.</p> <p>Similarly, Army programs to apply the criteria of adverse effect to Army undertakings having the potential to adversely effect archaeological sites, historic buildings, structures and objects; and properties of traditional religious and cultural significance eligible or potentially eligible for listing in the National Register [of Historic Places] must be implemented in consultation with the Alaska State Historic Preservation Officer on a case by case basis through procedures established within the HPC.</p> <p>The mitigation of adverse effects to archaeological sites, historic buildings, structures and objects; and properties of traditional religious and cultural significance eligible or potentially eligible for listing in the National Register [of Historic Places] that cannot be avoided must also be implemented in consultation with the Alaska State Historic Preservation Officer on a case by case basis through procedures established within the HPC.</p>	<p>NOTED</p> <p>NOTED</p> <p>NOTED</p>	<p>-----</p> <p>-----</p> <p>-----</p>
215	p.57, line 11 – change to state that USAG-AK will implement.	Corrected	See page 60, line 4
216	p.57, line 14 – develop and update is used twice in the sentence.	Corrected	See page 60 Line 5
217	p. 57 line 14. Edit.	Edited	See page 60,
218	p.57 bullet 1 – delete one set of “develop and update”	Corrected	See page 60 Line 35
219	<p>p.58 – last 2 bullets – Coordinate consultation, and develop and implement agreements such as those in process, with Native Alaska Tribal governments.....Develop and implement further additional practices recommended throughout this process.</p> <p>Coordinate identification, assessment, and beneficial management of properties...</p>	<p>NOTED</p> <p>changed</p>	<p>-----</p> <p>See page 61, line 19</p>
220	p. 60 lines 10-12. As determined how?	Clarified	See page 60, line 11.
221	p. 62 line 8 edits.	Corrected	See page 61, line 8.
222	p. 62 -- SOP1 Identifying Undertakings -- This	Added	

	needs tribal involvement, before setting in stone. Tribal selection criteria might be different. It would be helpful to understand the Army's leading influences on prioritizing or selecting certain ones over others.		
223	p. 62/SOP 1 Identifying Undertakings/Line 3: Typographical errors – replace “arms” and “while” with “Army” and “whole.” Are you sure that all undertakings are not the responsibility of the Army. The Army may delegate the authority to consult to another party, but doesn't the Army still remain responsible to ensure that the delegated authority completes consultation? Please instruct the user agency to consult with the Alaska State Historic Preservation Officer on a case-by-case basis in accordance with section 106.	NOTED	-----
224	p.62 and p.107 --How does SOP 1 (Identifying Undertakings) fit with SOP 10 (Reviewing and Monitoring)?	SOP 1 covers activities taken on individual undertakings. In the creation of this SOP, stakeholders and the installation set out how the installation will identify undertakings and APEs. SOP 10 concerns reviewing and monitoring of all activities during a review cycle (annual, semi-annual) by the installation and stakeholders. At these meetings past and planned future undertakings can be discussed and the success of the HPC can be evaluated.	
225	p.62, line 8 – change Arms to Army and while to whole.	Corrected	See page 65, line 8
226	p.62, line 17 – Change Section 106 to 36 CFR Part 800.	Corrected	See page 65, line 16
227	p.62, line 19 – this section should state that tenants should coordinate with USAG-AK to obtain current cultural resources information. Undertakings conducted by or for Army tenants with funding appropriated for the tenant organization are the responsibility of the tenant; likewise, compliance with 36 CFR Part 800 for these undertakings is the responsibility of the tenant.	Added	See page 65 Line 18
228	p.62 – 12, 13 – Undertakings may originate with DPW,...And other entities, including Alaska Native Tribes.	NOTED	-----
229	p.62 – 25 – CRM shall in turn notify Tribes early in the process when relevant properties are likely to be affected.	NOTED	-----
230	p. 62/ SOP 1:17/Notificaiton: Is this the section that is supposed to describe how notification of undertakings is integrated into the NEPA process? What about notification to the public?	Yes	See SOP 1.17
231	p. 63/SOP 1.2/ Determining an Undertaking: Can you provide a chart or list of typical undertakings for cultural resource management staff to reference?	NOTED	-----
232	p. 64 -- SOP2 Categorical Exclusions -- We agree that wetlands, steep inclines, and moraine features should not be categorically excluded. Numerous historical or culturally significant locations have	NOTED	-----

	been documented throughout Alaska in such places. It is recommended that there be an "Exception from Exclusion under unusual circumstances" category. That would allow regulation features to kick in like for "Inadvertent Discoveries" within the cantonment area, for example.		
233	p. 64 lines 22-25. Clarify.	Clarified	See page 63, lines 24-25.
234	p.64, line 1 – should include Exempted Undertakings in the title to this section.	NOTED	-----
235	p.64, line 8 – add exempted undertakings to this line.	Added	See page 67, line 9
236	p.64, line 9 – change "under a categorical exclusion" to "into one of these categories".	Corrected	Seep page 67, line 9-10
237	<p>p. 64-SOP 2 -- Documentation Requirements (suggested wording)</p> <p>Categorical Exclusions</p> <ul style="list-style-type: none"> • The date the Categorical Exclusion was completed. • A written description of the undertaking. • A statement indicating that the proposed undertaking has been evaluated with respect to the categorically excluded undertakings in SOP 2. • A statement indicating that as a result of the evaluation the CRM has determined that the proposed action either, <ul style="list-style-type: none"> 1. is a categorically excluded undertaking as outlined in SOP 2 and, therefore, does not require the preparation of an EA, or 2. is not a categorically excluded undertaking as outlined in SOP 2 and, therefore, an EA must be prepared. 	Should be part of annual report. Need further discussion	-----
238	p. 64/SOP 2 and SOP 2.1 Categorical Exclusions: Exclusion, exemptions-are they the same thing? SOP 2.1 doesn't seem to be written as a procedure. The first paragraph is, but the subsequent paragraphs don't seem to be linked directly to the first paragraph. The use of the words exemption and exclusion are confusing-and there is no direct instruction in the first paragraph that requires the CRM to review the subsequent paragraphs 2.1 through 2.9 to see if they are applicable to the undertaking under review.	2.1 lists undertakings that do not have to go through a procedure. They are already "off the table" for review according to the AAP. Perhaps need to clarify text with some explanation at the beginning of the SOP that what follows as subsections of SOP cover X type of things or relate in X way to the overall SOP.	
239	p. 65/SOP 2.1 Categorical Exclusions: Please maintain a current list of the applicable fully executed Programmatic Agreements or Program Alternatives for cultural resource management staff to reference. Update the list periodically.	NOTED	-----
240	p. 65/SOP 2.2 Categorical Exclusion: Please include maps of the areas being referred to, including cantonments and historic district boundaries.	Added	See Figures 1 – 5.

241	p. 65 line 11. As stated above, failing to comply with existing federal law because of “mission considerations” is not acceptable.	Struck	See page 68, lines 4-6
242	p.65, line 3 – memoranda of agreement are not exempted under the AAPs, only programmatic agreements.		
243	p.65 – 13 – Designated impact areas <u>may</u> contain.....Add language to the effect that: Strategies should be considered to facilitate cultural resources assessment and management in these areas. Note: Unexploded ordnance detection and avoidance scheduling procedures would be worthwhile to investigate and protect significant cultural resources.	See additions	See page 68 Line 9-10
244	p.65, line 19 – you may want to mention in this section that if properties are discovered while working in cantonment/ developed areas, they will be dealt with under SOP 12 (inadvertent discoveries).	Added	See page 68 Line 23
245	p.66, Section 2.3 – you should explain here that these do not fall under the exempted undertakings because they are not an “immanent” threat.	Addressed	See page 68 Line 31
246	p. 66 line 22-24. No categorical exclusion is appropriate here.	Clarified	See page 68 – 69,
247	p. 66 This also applies to SOP 2.4	NOTED	-----
248	p.67, line 18 – you may want to add restoring to altering and damaging. If sidewalks, vegetation steps, etc. are restored then they should be OK, right?	NOTED	-----
249	p. 68/SOP 2.6 Categorical Exclusions: Improper placement of insulation and vapor barriers can have an adverse effect on historic buildings.	NOTED	-----
250	p. 69/SOP 2.8 Categorical Exclusions: Reglazing and caulking broken windowpanes to match in kind-would be acceptable. Original may not be known.	Corrected	See page 71, line 14
251	p.71, line 14 – should read “encompassing both potential direct and indirect...”	Added	See page 73, line 13
252	p.71, line 18 – you should state who determines the APE.	Added	See page 73 line 11
253	p. 71 APE. The indirect and cumulative effects of a project should be defined and emphasized more. Borrow sources, access roads/trails, and helicopter pads should be identified explicitly.	NOTEC	-----
254	p. 73 -- SOP4 Identifying and Evaluating Cultural Resources This should require tribal involvement. Removals per tribal relevant resources, needs tribal permission and input. There is a reference to Appendix 1 that does not appear to correspond to this section. The criterion needs to include tribal and tribal people and places. Local and Regional histories need to include us. There needs to be concurrence that a natural setting could be historical as well. Consideration must be given to the fact that newspapers and historical documents tend to have focused on people other than tribes and their peoples. To even be mentioned in earlier	Appendix reference corrected.	See page 75,

	publications would have been very significant. More language needs to be developed in this section. Survey requirements need tribal involvement when relevant to the tribe or its people. This section also needs to include professional criteria for tribes as suggested earlier. Tribes do not need to include language in this document about how they determine those things. The Army will accept those who the tribe designates as having sufficient qualifications. Could there be language to include apprenticeships (younger people) to allow the traditional passing of knowledge, please.		
255	p. 73--SOP 4.1.1 Preliminary Analysis: It is stated elsewhere that the AHRS files are included in the USAG-AK inventories and maps, but this should be stated here as well for clarity. SOP 4.1.2 mentions AHRS.	Added	See page 76, line 2
256	p.73 – SOP 4.1 – Consultation with Tribes should begin with background analysis (throughout the process) on studies related to cultural phenomena significant to the Tribe (as in survey method recommendation at bottom of p. 75).	Corrected	See SOP 16
257	p.73, footnote 3 – don't formal property listings for properties on Federal lands go through the Federal Preservation Officer rather than the SHPO?	Corrected	See page 72, footnote 4
258	p. 73 SOP 4 and P 119, SOP 14 -- Make provisions for confidentiality of properties and information when make determinations of eligibility for the National Register of Historic Places. Explain this process again briefly in next meeting. We need to check with ACHP / AEC staff about devising such provisions.	NOTED	-----
259	p. 73/4 Preliminary analysis. "Resources for this review include: ADD <u>"but are not limited to:"</u> The way it reads now would limit the analysis to the cultural resource inventory /maps on the GIS at Ft. Rich. And a predictive model. The latter have not proven very effective, at least in Alaska, and anyway, none would be available until at least 2006(pg. 42). Other resources would be place names, minerals maps, USGS topo maps, historical documents, etc.	Added	See page 75 Line 24
260	p. 74, bottom of page. I am concerned that decisions made by the CRM cannot be reviewed, appealed, or questioned until after any damage is done. They are not made available until the annual report is reviewed. At least, the SHPO should be consulted immediately upon any decision.	Addressed in NEPA process	-----
261	p. 74 line 8. Use of predictive models generated by the Army runs the risk of falling prey to the fallacy of affirming the consequent. In my view the predictive models that could be generated with the data collected to date are not adequate for planning processes, particularly when they seek to generalize beyond the areas already surveyed.	NOTED	-----
262	p.74 bottom – Consultation on potentially significant phenomena should be considered for initiation long before a decision to proceed is "documented in the annual report."	NOTED	-----
263	p. 75 lines 16 and 17 make reference to two	These two documents should be	-----

	documents. Where are they and how do we get them?	available through the State Historic Preservation Officer	
264	p.75, line 4 – change should to shall.	Corrected	See page
265	p.76, line 9 and P77, line 3 – states that AHRS forms are to be completed. Discuss what happens to these forms. Are they kept in your office? Sent to the SHPO?	AHRS is completed for each archaeological site and submitted to SHPO and maintained by USAG-AK. AHRS cards for buildings when completed are not used by USAG-AK. AHRS is not sympathetic to bldgs.	-----
266	p. 76 line 24. Determined by whom? This requires consultation with interested parties.	Clarified	See page 78, line 5
267	p. 76 The paragraph about the SHPO “request” should be deleted. The AHRS data is, and should be, mandatory in the next section as a part of “survey” on p. 77.	SHPO request, not required by 36 CFR Part 800	-----
268	p.76 – Note that Nancy Davis and the Dena’ina Team contributed some of the most valuable survey information to date without fulfilling the requirements to supervise survey. This requirement should be negotiable for projects cooperatively conducted under agreements with Alaska Native Tribes.	NOTED	-----
269	Pp 76/77 There seems to be a gap here between SOP’s 4.1.2.1 and 4.1.2.2. The jump is from a presumably prehistoric archeological survey to surveys for surviving historic buildings. Historic ruins; i.e., cabin remains, tin can/bottle dumps, etc are probably more efficiently documented by archeological methods but require some historian expertise.	NOTED	-----
270	p. 77 line 8clearly labeled IN ACCORDANCE WITH MUSEUM GUIDELINES.	Added as “repository’s guidelines”	See page 78, line 15
271	p.77, line 7 – after Alaska Museum, add or another appropriate, certified curation facility.	Added	See page 78, line 14
272	p.77, line 9 – copies of these reports, are the draft and final versions coordinated with anyone outside USAG-AK? SHPO? Tribes? BLM?	If done to meet Section 110 requirements, will not be coordinated outside of the HPC process. If done to meet Section 106 requirements will be coordinated as outlined by HPC’s SOPs	-----
273	p.77 line 7, also p. 122 - ...curation in the U. of Alaska Museum (Add): upon consultation with Alaska Native Tribes when relevant. Curation of Dena’ina cultural artifacts to Fairbanks removes them from their traditional cultural area and people. The upper Cook Inlet Western culture is already too unaware of the aboriginal culture here. Less removed curation and interpretive display might help address this situation, should interesting aboriginal artifacts be discovered and affected.	NOTED	-----
274	p. 77 “Submit report... including a determination of the need for further evaluation... or lack thereof.” Confusing; is this a determination of eligibility? It should be noted that ALL sites are, at least initially, potentially eligible. I would recommend the following: “a short description of sites identified, including a determination of the need for further testing.” A description of artifacts found and/or collected, including waste flakes, features, charcoal, etc	It is a statement that either there is enough information based on the survey to say the site is not eligible for listing or that further research is needed to make a determination of eligibility.	-----

	should be integrated with the report.		
275	p. 77/SOP4.1.2.1 Identification and Evaluation: Is there an agreement between Army, University of Alaska Museum? It should be made part of the HPC.	Yes	-----
276	p. 77/SOP 4.1.2.1 Identification and Evaluation: Programs to evaluate the eligibility of archaeological sites, historic buildings, structures and objects; and properties of traditional religious and cultural significance for the National Register [of Historic Places] need to be implemented in consultation with the Alaska State Historic Preservation Officer on a case by case basis through procedures established within the HPC. Please provide.	NOTED	-----
277	p.78, line 14 – see previous comment.	NOTED	-----
278	p. 78, SOP 4.1.2.2/Line 14: Should HAER be included?	Added	See page 79, line 14-15
279	<p>p. 78/SOP 4.1.2.2 Identification and Evaluations: Programs to evaluate the eligibility of archaeological sites, historic buildings, structures and objects, and properties of traditional religious and cultural significance for the National Register [of Historic Places] need to be implemented in consultation with the Alaska State Historic Preservation Officer on a case by case basis through procedures established within the HPC. Please provide.</p> <p>This is a minimal description of the components necessary to complete the inventory and evaluation of historic properties for their eligibility for listing in the National register of Historic Places. Minimum levels of information are not established. No minimum standards are cited to provide guidance for cultural resource management staff. Provide better survey standards.</p>	NOTED	-----
280	p. 79-104 – SOPs in development for determining cultural significance, assessing and managing effects, should inform and honor Alaska Tribal input at any step throughout the process when relevant.	NOTED	-----
281	p. 79? Who will evaluate, consult, approve?	CRM will evaluate/approve. Also will identify who may need to be consulted.	-----
282	Page 79, SOP 4.1.2.3 USA must not be allowed to let historic properties decay until integrity is lost.	NOTED	-----
283	p.79--SOP 4.1.2.3 It is understood that this is still under development. Presumably it will be a major topic for discussion with AK Native groups. Who is to represent the interests of Non-Native cultures for their TCPs?	NOTED	-----
284	<p>p. 79/SOP 4.1.2.3 Identification and Evaluation: Programs to evaluate the eligibility of archaeological sites, historic buildings, structures and objects, and properties of traditional religious and cultural significance for the National Register [of Historic Places] need to be implemented in consultation with the Alaska State Historic Preservation Officer on a case by case basis through procedures established within the HPC. Please provide.</p> <p>No standards are cited to provide guidance for</p>	NOTED	-----

	cultural resource management staff. Minimum levels of information are not established. Provide better survey standards.		
285	p. 79 Line 1. "If historic resources are identified in the APE, the CRM will determine if it is eligible for listing..." It should be noted, AND EMPHASIZED, that the CRM does not determine eligibility, which is the prerogative of the SHPO. This erroneous assumption pervades the present document and is conspicuous in SOP 4.2 Evaluation.	The lead federal agency makes determination of eligibility in consultation with SHPO. See 36 CFR 800.4(c) (2).	-----
286	p. 80, Line 22 - The sentence ends with a semicolon followed by and, is there more to this sentence, if so what is it?	NOTED	-----
287	p. 81 Determinations of Eligibility are subject to review through the NEPA process and the...annual Report. See my comments re page 74.	NOTED	-----
288	p. 81 line 6. Application of the "Integrity" criteria is problematic. Even heavily disturbed sites could still be eligible under criteria D, and a decision to exclude them because they are deemed to no longer have integrity may be inappropriate in some cases.	Clarified	See page 84-85
289	p.81, lines 9 and 10 – good, but how is a property handled when the location is to be kept confidential? You may want to include somewhere in the HPC an alternate process for getting confidential information to those that need to see it. This could be nothing more than placing confidential information in a separate addendum to the NEPA document and including these with the NEPA document for those people with a need to know.	NOTED	-----
290	p. 81/SOP 4.2.1.3 Identification and Evaluation: Programs to evaluate the eligibility of archaeological sites, historic buildings, structures and objects, and properties of traditional religious and cultural significance for the National Register [of Historic Places] need to be implemented in consultation with the Alaska State Historic Preservation Officer on a case by case basis through procedures established within the HPC. Please provide. The statement "no further action is required" is misleading. Find a new way to express this idea that is not so confusing.	NOTED	-----
291	p. 83, Line 21 should refer to Appendix 2, not appendix 1	Corrected	See page 84, line 20
292	p. 85. This is the first mention of a research design. What is it, and where does it come from? How do we get access to it? I suggest we seek a DOD Legacy grant to develop some questions that would help guide eligibility under criteria D. Additionally, there are many kinds of research designs to focus on different kinds of questions; e.g., age, trade, technology, etc. This topic should, perhaps, be addressed in the "Goals and Objectives" section (p. 53)	NOTED. Research design will be dealt with in the ICRMP	-----
293	p. 85 -- Line 14. Comparison, to evaluate integrity, should also be made to other prehistoric sites.	NOTED	-----
294	p. 85/4 Line 25. This says that, for criterion D,	Made comment	See page

	setting does not apply. However, riverine, lake, bluff or ridgetop, etc are settings that are very important to the analysis of prehistoric(and historic) sites, especially as a factor in determining the <u>pattern</u> of sites		
295	p. 86 – define significance	Made comment	See page 85 Line 7-10
296	p. 86 Lines 6-8. See above re determination eligibility. “If, upon evaluation, the CRM determines that the resource retains integrity, the resources shall be determined eligible... [or, if not] ...the CRM will determine that the resource is not eligible.... “ Since positive determinations require further attention, this situation can , perhaps, be dealt with, but, if the resource is determined not eligible, then “no further action is required”, meaning that the site (resource) is deemed of no value and may be destroyed by the no action provision.	NOTED	-----
297	p.88, line 18 – you should also state that determination will be included in the NEPA document.	Made comment	See page 87 Line 18
298	p. 88, SOP 5.1/ line 16: Change spelling NOR to NOT	Corrected	See page 87,
299	p. 88 -- SOP5 Assessing Effects -- This should require tribal involvement.	NOTED	-----
300	p.89, line 3 – states that CRM will determine if cultural resources are adversely affected. This is only required if those resources have been determined eligible for the National Register.	NOTED	-----
301	p. 88-SOP 5 -- need clarification between “no cultural resources” and “no affect”.	NOTED	-----
302	p. 88/SOP 5.1 Assessing Effects: This is not clear enough a distinction between no historic properties affected and no adverse effect. Using this definition, what is the difference between no historic properties affected and no adverse effect? Under Item 1 of the documentation requirements, strike the words “as necessary.” Provide requirements for a minimum level of documentation that is required in all circumstances. Change the language “no further action is required.” It’s misleading.	NOTED	-----
303	p. 88-91/SOP 5.1 and SOP 5.2 Assessing Effects: The distinction between undertakings that are categorical exclusions, or that occur where no historic properties are affected and those undertakings where there is the potential to have an adverse effect on historic properties must be made clear.	NOTED	-----
	Army programs that apply the criteria of adverse effect to undertakings that have the potential to adversely effect archaeological sites, historic buildings, structures and objects; and properties of traditional religious and cultural significance eligible or potentially eligible for listing in the National Register [of Historic Places] must be implemented in consultation with the Alaska State Historic Preservation Officer on a case by case basis	NOTED	-----

	through procedures established within the HPC. Please provide.		
304	<p>p. 88/SOP 5.2 Assessing Effects: The distinction between undertakings that are categorical exclusions, or that occur where no historic properties are affected and those undertakings where there is the potential to have an adverse effect on historic properties must be made clear.</p> <p>Army programs that apply to the criteria of adverse effect to undertakings that have the potential to adversely effect archaeological sites, historic buildings, structures and objects; and properties of traditional religious and cultural significance eligible or potentially eligible for listing in the National Register [of Historic Places] must be implemented in consultation with the Alaska State Historic Preservation Officer on a case by case basis through procedures established within the HPC. Please provide.</p>	<p>NOTED</p> <p>NOTED</p>	<p>-----</p> <p>-----</p>
305	p. 89, Line 8 - add <u>be</u> to "when there may <u>be</u> an effect"	Corrected	See page 88, line 7
306	p.89, line 10 – again, is this documentation to be included in the NEPA document?	In project file	-----
307	p. 90 Line 24. I doubt very much that a finding of adverse effect will be important to a native Hawaiian organization.	<p>NOTED</p> <p>Wording as found in 36 CFR § 800.5(2)</p>	-----
308	p. 92ff SOP's 6, 7, and 8 are quite similar. The term "applying best management technique" is ineffectual; it really doesn't mean anything. Anyway, the options presented are repeated in SOP 7 and in better language. SOP 6 should be deleted.	NOTED. These SOPs are mandatory elements of the HPC. Each SOP addresses a separate aspect of dealing with effects.	-----
309	p. 92 line 21. Remove "to the extent feasible".	NOTED	-----
310	p. 92, line 21; P93, line 9 and 18 – you shouldn't say "to the extent feasible". If it isn't feasible it can't be a best practice.	NOTED	-----
311	p. 92-94/SOP 6.1, SOP 6.2 and SOP 6.4 Applying Best Practices: Describe the protective measures that are to be used to protect archaeological sites, properties of traditional religious and cultural importance and historic districts.	Made comment	See page 91 – 92
312	p. 92 – SOP 6 Applying Best Management Practices -- We need a copy of the Best Management Practices if we are to agree to it, since it is referenced in this document. This will give us an opportunity to include exceptions to that plan should there be any part that we cannot agree to if relevant to tribes. Districts relevant to tribes should include tribal input. There should be more than just Traditional/Religious/Cultural importance. Local and Regional histories should include those of tribes, tribal people, and their historical places. Periodic monitoring could include tribes on tribal relevant locations.	SOP presents the Best Management Practices. Not an existing document for review	-----
313	p. 92 – SOP 6 Numerous related documents are referenced in this document that tribes need focused training on, such as the Best Management Practices. Tribes should be able to state objection to those parts of the documents that disturb them,	NOTED	-----

	since they were not participants in their development. Tribes should be invited to participate in development of documents in the future when it impacts them, their members, and their interests.		
314	p. 93/SOP 6 Applying Best Practices: All undertakings that do not follow the Secretary of the Interior's Standards would have an adverse effect on historic properties and must be implemented in consultation with the Alaska State Historic Preservation Officer on a case-by-case basis through procedures established within the HPC. Please provide.	NOTED	-----
315	p. 93 and 94/SOP 6.3 and SOP 6.4 Applying Best Practices: What is meant by subject to the availability of funds? Can you provide a more precise explanation? Are the requirements of the ACHP and DOD Instruction 4715.3 applicable?	Funding is subject to availability. Not all requests put forth are funded.	-----
316	p. 93 – SOP 6.2 --Since Army space requirements change from year to year or often month by month no extant building on Ft. Wainwright is save from demolition. We therefore request that buildings within the National Landmark and those contributing to the landmark be withdrawn form current and future demolition plans and that buildings within the proposed National Historic District be carefully rehabilitated and preserved.	NOTED	-----
317	p. 93 – SOP 6.2 --When building a new structure to take the place of one lost it is important that the new structure is built in an architectural style and scale to complement other buildings within the landmark or the historic district.	NOTED	-----
318	p. 93 – SOP 6.2 -- It is important that a Sense of Place be preserved or even enhanced. It is good for the military as well as the civilian community to know of the role Fort Wainwright has played in the past so that we may better understand current and future demands that may be made on all of us.	NOTED	-----
319	p. 93 – SOP 6.2 -- We would like to refer you to the Secretary of Interior's standard of eligibility for historic sites and landmarks. Once these standards are met the buildings need to be protected, maintained, restored and rehabilitated. Sensitive planning by the military will insure that the historic buildings will remain or again become useful to current and future missions.	NOTED	-----
320	p.93, lines 13 and 14 – what happens if a tribe doesn't want protective measures? Can't letting a site deteriorate be a best practice if it respects the values and wishes of a tribe? This would be something to work out with the tribes for those properties of traditional religious and cultural significance.	Yes, this is an option and can be worked out ahead of time for specific sites or it could be an option provided for in the HPC to be developed as situations arise.	
321	p. 93, SOP 6.3/ line 18: First bullet strike: “, to the extent feasible,”	NOTED	-----
322	p. 93-SOP 6.3 and p.113-SOP 13 -- Need to consider scale and other design concerns when new construction is being proposed within the National Historic Landmark at Fort Wainwright.	NOTED	-----

323	p.94 - SOP 6.4 --NPS rep would like to see design guidelines rewritten for the National Historic Landmark.	NOTED	-----
324	p.94, line 10 – should begin “It is”; overtime should be over time. Also change the passive voice in this sentence. Who should be consulting the CRM for updates?	Corrected	See page 92, line 27
325	p.94 and 95 – here again we use “when possible” “to the extent feasible” “will attempt” and “subject to the availability of funds”. These aren’t appropriate phrases for best practices.	NOTED	-----
326	p.94 line 17 – you say “potential effect” but if we have gotten to the best practices step, we should know if there is actually an adverse effect.	NOTED	-----
327	p. 96-100/SOP 7, SOP 7.1 and SOP 7.2 Alternative Review: All undertakings that do not follow the Secretary of the Interior’s Standards would have an adverse effect on historic properties. The review of alternatives to avoid or minimize adverse effects must be implemented in consultation with the Alaska State Historic Preservation Officer on a case-by-case basis through procedures established within the HPC. Please provide.	NOTED	-----
328	p. 96--SOP 7 Protection Lines 14-17: In the case of allowing impacts on part of a site and protecting the rest of it, presumably some data would be salvaged from the impacted portion as appropriate? Since avoidance, protection, and monitoring are often discussed as mitigation options it would avoid confusion to mention in the introduction to SOP 7 that mitigation per se is addressed in SOP 8 and that SOP 7 is written as a first step-an attempt to reduce or eliminate the effect.	NOTED Addressed in SOP 8 Clarified	----- See page 94, lines 9-11
329	p.96, line 7 – add “adversely” between “avoid” and “affecting”	Added	See page 94, line 7
330	p.96, line 15 – is this documentation to be included in the NEPA document also?	Project file	-----
331	p. 96 --SOP7 Alternatives Review -- Statements about monitoring need to state by whom. Periodic monitor partnering and tours of certain sites could include interested tribes. Put tribes at the planning stages so avoidance is more assured. Protection options need to be discussed with tribes. Preference hierarchies could be arranged ahead of time for known situations and conditions and even for specific sites.	Made comment	See page 95-96
332	p.98, section 7.2 – this section discusses alternatives that might be used for minimizing impacts to historic buildings and structures. What about ways to minimize visual impacts? New construction next to historic buildings or districts could include design which is compatible in size, scale and design.	NOTED Addressed in following Secretary of the Interior’s Standards for the Treatment of Historic Properties	-----
333	p. 99, Line 14: Out-granting historic...great idea!!	NOTED	-----
334	p. 101, Line 21: Other suggestions	Asking for other suggestions	-----
335	p. 101-105/SOP 8, SOP 8.1, SOP 8.3, SOP 8.4 and	NOTED	-----

	SOP 8.5 Treatment of Adverse Effects: The development of standardized mitigation measures for certain classifications of undertakings has merit. The selection of appropriate mitigation measures to avoid or minimize adverse effects of specific undertakings must be implemented in consultation with the Alaska State Historic Preservation Officer on a case-by-case basis through procedures established within the HPC. Please provide.		
336	p. 101. Public interpretation is not a form of mitigation. It may (and should) be part of a mitigation effort, but it is not sufficient in and of itself. Similarly, deciding to protect only a part of a site when the nature of the resource is not fully understood is, in my view, not appropriate.	NOTED	-----
337	p.101--SOP 8.1 should mention at the end the obligation of Fed agencies to make some form of results available to the public and the archaeological community.	Added	See page 98, line 16-18
338	p.101, lines 7 and 8 – you use the term “most”. How will you handle those exceptions?	Through NEPA. In an EIS exceptions will be address in preparation of the ROD.	-----
339	p.101-SOP 8 --How does USAG-AK identify where “standardized mitigation” is appropriate?	Standardized mitigation is appropriate in undertakings that do not kick in an EIS.	-----
340	p. 101 SOP 8. Line 24. Excavation (data recovery) “is implemented as a last resort” WHY? For many, if not most, of the types of sites to be found in this region, the site can be fully excavated within a few days with a small crew (the Alyeska pipeline archeology can attest to this) and thus with minimal expense. It doesn’t even have to be a full excavation to extract the data required. Encapsulation requires heavy equipment and a borrow source, in addition to time and personnel (probably more expensive time and more expensive personnel than an excavation crew). How much soil would be required to protect a site from explosives, a tank trap, etc? If another medium is used (concrete), it would be even more expensive and time-consuming. And the information the site contains (Criterion D) would be yielded immediately, not postponed, probably forever. And then, there would be no more site to worry about. Frankly, for most of the sites which might be adversely affected by a proposed project, mitigation by excavation should be the <u>preferred</u> method.	NOTED	-----
341	p. 102 requirements for excavation. ARPA permits should be required.	NOTED	-----
342	p.102, line 16 – you may want to refer the reader to SOP 15.	Added	See page 98
343	p. 102 line 1. Change to “...excavation, documentation, analysis, and reporting.”	Added	See page 97, line 25
344	p.103--SOP 8.3: Large format versus 35 mm photography is not consistently specified in the HABS/HAER documentation discussion, isn’t it large format for Levels 1-III and 35 mm for level IV?	Clarified	See Page 99, and Page 100
345	p.103 – SOP 6.2 --How will TCPs (Traditional	Added	See Page 98

	Cultural Properties) that are NOT on the National Register of Historic Places (NRHP) be dealt with/managed/protected?		
346	p.103/SOP 8.3 Treatment of Adverse Effects: Include provisions requiring the maintenance of a permanent record of treatment for the historic property. Another mitigation measure that is sometimes effective is to commit to the rehabilitation of another threatened historic property. Develop a table that identifies the appropriate HABS documentation standard for each historic property.	Record added. Are you comfortable with CRM identifying rehabilitation of one property to mitigate demolition of another, i.e. rehabilitation of North Post Chapel for the demolition of Hangar 1?	See page 100
347	p. 104 line 23: If an eligible building is going to be destroyed, then HABS Level I/large format photography is justified. [This paragraph ends mid-sentence]	Clarified	See Comment 102.
348	p.104, line 15 – eliminate the passive voice. Who will make the determination as to the appropriate level of documentation, the CRM?	Corrected	See page 100
349	p.104, line 25 – text is missing	Corrected	See page ?
350	p. 105 – SOP 8.5 --Clarify/remove “out granting” as a term/concept.	Omitted	-----
351	p.105--SOP 8.4: Make sure this language addresses evaluating districts as a whole, rather than on a property-by-property basis.	First draft developed.	See page 101- SOPs 8.4.1 and 8.4.2.
352	p.105 – Please mention <u>Eklutna Tribal Land Trust</u> as eligible for outgranting and to hold preservation easements for relevant cultural phenomena on Fort Richardson.	NOTED	-----
353	p.106--SOP 9: Not sure what the phrase Acceptable Loss means, so no comments at present.	NOTED	-----
354	p. 106/SOP 9 Documenting Acceptable Loss: What is meant by the term acceptable loss? Define the specific conditions under which this term is applicable. Include provisions requiring the maintenance of a permanent record of treatment for the historic property. Develop a table that identifies the appropriate HABS documentation standard for each historic property.	The conditions under which documenting acceptable loss is applicable are contained within the AAP 3.5.f.1(vi) and they are: (vi) Documenting Acceptable Loss: This SOP shall provide for determinations to proceed with an undertaking having an adverse effect where the installation commander has determined that treatment/mitigation is not in the best public interest or is not financially or otherwise feasible. The installation commander's determination, including a discussion as to how the preceding steps in the decision making process were carried out and a rationale as to why mitigation measures will not be applied, shall be provided to consulting parties and the Council for a 30-day review, prior to implementing the undertaking. Upon receiving the written reviews of the Council, the installation commander must consider the Council's comments and provide written documentation of his or her decision to the Council and the consulting parties.	-----

		<p>Specific conditions of applicability depend on specific undertakings and resources and cannot be known until a situation arises-unless there are contaminated areas or other similar areas now known and resources within them can be listed in this SOP.</p> <p>Suggestions of providing for maintenance of permanent record of treatment and table of HABS documentation is noted.</p>	
355	p. 106 – SOP 9 Documenting Acceptable Loss -- Language needed. What is acceptable loss? The disproportional impact on tribal people needs to be weighed in.	See comment 354 and impact on Tribal people noted. Need more discussion with Tribes regarding this.	-----
356	p. 107 – SOP 10 Reviewing and Monitoring - - The site links in the "PDF" leads to titles that are difficult to evaluate without opening each document. The titles are crunched at the website. Annual reviews alone would interfere with the timelines allowed to respond or take action when a tribe may not agree with decisions. This needs further discussion to ensure that tribes do not lose such a critical procedure step. Will the annual report allow comments or disagreements to be added?	<p>Addressed in new Web page</p> <p>www.usarak.army.mil/conservation</p>	-----
357	p. 107/SOP 10 Reviewing and Monitoring: What about Alaska State Historic Preservation Officer review? The HPC needs to establish procedures that include case by case consultation to identify and evaluate potentially eligible National Register [of Historic Places] properties, to apply the criteria of adverse effect to undertakings that have the potential to adversely effect historic properties, to review alternatives that avoid or minimize adverse effects to historic properties, and to select appropriate mitigation measures in the event an adverse effect to a historic property cannot be avoided. These procedures must be integrated into the NEPA process, if there is any hope the NEPA review process can be used for these classes of undertakings. This section does not adequately address how this could occur.	NOTED	-----
358	p. 107/SOP 10.1.1. Reviewing and Monitoring: How will the consulting parties and tribes be notified? The consulting parties include the Alaska State Historic Preservation Officer according to the Army Alternate Procedures. Revise the wording "parties" to read "consulting parties."	Addressed in SOP 10.1.1	See page 106
359	p..107--SOP 10: aren't there projects that will occur with potential cultural resource effects that would NOT trigger NEPA? Perhaps there should be provision for a review process on small but sensitive projects (or some similar language).	NOTED	-----
360	p.107, line 19 – spell out the CATEX after cultural resources. We don't want to confuse the acronym CATEX, which is a NEPA term, with what is used in the AAPs.	Corrected	See page 105

361	p.107 – SOP 10 -- Make the NEPA process clear. Develop flowchart, other easily understood information on the process and how and when to participate. Do this in mailings and in next meetings. How are determinations publicized?	Flowchart Added	See Figure 7, page 107
362	p. 107 SOP 10 Review and Monitoring. My main concern here is with the <u>timely</u> review of actions taken. If a site is “determined” not eligible by the CRM (not the SHPO) or through the CATEX exclusion, then a project may go ahead immediately and no remediation can be accomplished if the “determination” or CATEX exclusion is erroneous or incomplete.	NOTED	-----
363	p. 108 SOP 10.2. Lines 23, 24. Is the annual report distributed to consulting parties or only to the signatories? What is the difference? What about other “interested” parties or the public generally? Could it not be posted to the website? *Re the websites. The USAG-AK site was last updated two years ago, the downloads promoted on it were not downloadable, and Bill Quirk was listed as the Cultural Resource contact for Ft. Wainwright.	Annual report will be distributed to signatories. Non-signatories may access from web page as can other interested parties/general public.	-----
364	p. 108. Line 25. change to "...requirements and goals..."	Added	See page 111, line 12
365	p.108, line 22 – should there be a period after SOP?	Corrected	See page 112,
366	p.108, line 24 – replace signatories to this plan with consulting parties.	Signatories to the plan will receive hard copies. Interested parties that do not sign the plan will have access to the report by web page download.	-----
367	p.108-SOP 10 --What triggers State Historic Preservation Officer (SHPO) participation in the NEPA process and in various phases of project review considered under the HPC? Is it a specific project and/or particular defined steps in the process?	NEPA's public review process triggers SHPO's participation if SHPO so chooses to take an interest in the undertaking.	-----
368	p.108 – SOP 10 Environmental Assessments 1. Title Page <ul style="list-style-type: none"> • Document Type (EA) • Activity Type (Maintenance, Rehabilitation, Demolition, etc.) • Location (Include map) • Document Date 2. Description and Need for Proposal 3. Alternatives 4. Historic Property Impacts of proposal and alternatives <ul style="list-style-type: none"> • Include APE, Historic Properties present, Historic Properties Effected, and description of effects for proposal and each alternative. • Include maps, drawings, and photos as necessary. 	Topic for annual report. Needs further discussion	-----

	<p>5. List agencies and persons consulted with regarding potential effects associated with proposal, identifying controversial issues and any substantive opposing views raised by Federal, State, or local agencies or the public regarding the level of impact of the proposed undertaking.</p> <p>Environmental Impact Statements</p> <ul style="list-style-type: none"> • Summary • Purpose and Need • Proposed Action and Alternatives • Affected Historic Properties <ol style="list-style-type: none"> 1. Include APE, Historic Properties present, Historic Properties Effected, and description of effects for proposal and each alternative. 2. Include maps, drawings, and photos. • Expected Impacts • Consultation and Coordination 		
369	<p>p. 108 -- SOP11 Obtaining Technical Assistance -- The language on partnerships needs to include partnership with tribes. Cooperative agreements, in addition to those with tribes, should include tribal consultation language for both making the agreement and for the non-Army party to consult with tribes regarding the matters under this agreement or matters of interest to the tribe/s. This section needs the statement, "Tribes are excluded from these requirements due to their recognized special expertise and knowledge."</p>	<p>Added</p> <p>Comment on hierarchies - NOTED</p>	
370	<p>p. 101 -- SOP 8 Treatment of Adverse Effect -- As discussed in Anchorage, mitigation proposals in existing EIS statements need to be included. The purpose would be to encourage use of many options, which may include additional or combined options, for those times that avoidance is not achievable for good cause. Mitigation measures language is needed. It would be helpful to see an actual example of each HABS Level document set (for visual inspection) to be able to comment effectively as a tribal person. Also, a hierarchy of treatment preferences could be developed. What about for culturally important sites that might not have a religious association specifically? Regional and local history should include tribal peoples and tribes. We need a copy of the Natural Resources management plan if we are to agree to it, since it is referenced in this document. This will give us an opportunity to include exceptions to that plan should there be any part that we cannot agree to. This should apply to all such referenced documents.</p>	<p>NOTED</p>	<p>-----</p>
371	<p>p.109-SOP 10.1.1 -- Interested parties would like notification when there is a potential for an adverse affect to historic properties.</p>	<p>NOTED</p>	<p>-----</p>

372	p.109, line 10 – USAG-AK.	Corrected	See page 111, line 24
373	p. 109. Reviewing programmed undertakings is something that should be done more than one FY in advance. Acting in the best interest of the resource may require activities such as survey and excavation which can only be done during the summer. It is easy to envision a scenario where all activities under this process prior to an undertaking impacting a resource get jammed into too short a time for funding to be developed or the necessary work to actually be done. Wouldn't it be nice to know at least a few years ahead of time what the projects that must be addressed will be? I realize that there will always be things that come up at the last minute, but end of year money generally gets allocated for a project that someone has already dreamed up. Why not address such projects before they become a reality?	NOTED	See page 111,
374	p.109. Draft SOP 10.1.1 to include: (1) maintaining a stakeholder list, (2) requiring notification when there are potential adverse effects, and (3) provisions to invite stakeholders to participate in NEPA (i.e., make provisions for clear and timely notification to stakeholders when there will be an opportunity to participate in NEPA process concerning cultural resources).	Rewritten	See page 106
375	p.109, SOP 10.3 – you may want to add a statement that says consulting parties who want to see or visit particular historic properties that were dealt with under the HPC during the review period should contact USAG-AK in advance of the annual review meeting so that appropriate arrangements can be made.	Added	See page 112
376	p. 111, Line 10 - How about organizations seeking technical serves from us in regards to deciphering government documents we produce and send out to these qualified organizations? During the meetings, esp. the tribes complained that they did not understand and therefore could not make comment on documents we sent them.	Added	Page 113 Lines 11-14
377	p. 111, SOP 11: Maybe the Fairbanks North Star Borough Historic Preservation Commission should be named for Ft Wainwright Historic Preservation Issues.	“public organization”	-----
378	p.111, line 15 – expand this section. Who will partnerships be likely developed? Will these be formalized, and if so, how? What is the goal of having these partnerships? How will they improve your management of historic properties?	Expanded	See page 113
379	p.112, line 7 – will the CRM be writing all the scopes?	Yes	Page 114
380	p.112 – again, who will get copies of draft and final reports? Will draft reports be submitted out of courtesy or are you expecting comments?	Addressed	See page 112
381	p.113--SOP 13 (line 20): What does a building assessment consist of? If (Is) this a DOE with architectural focus or something more extensive?	Building assessment is an architectural/engineering review of the condition of the building, identifying	-----

		architectural elements that are historic and those that are not, identifying deficiencies of the building and plan/cost estimate of correcting those for continued use or adaptive reuse of the building.	
382	<p>p. 113 -- Standard Operating Procedure 13 National Historic Landmarks</p> <p>13.1 Determine Undertaking</p> <p>CRM will determine if project, activity, or program is an undertaking as defined in 36 CFR 800.16(y), using SOP 1.</p> <ul style="list-style-type: none"> • If CRM determines that project, activity, or program is not an undertaking, no further action is necessary. • If CRM determines that project, activity, or program is an undertaking then CRM will proceed to Section 13.2. <p>13.2 Categorical Exclusions</p> <p>CRM will determine if proposed undertaking is a categorically excluded undertaking as outlined in SOP 2.</p> <p>If proposed undertaking is a categorical exclusion CRM will document decision and proceed with project.</p> <ul style="list-style-type: none"> • A summary of categorical exclusion documentation will be provided in the quarterly report. <p>If proposed undertaking is not a categorical exclusion, CRM will proceed to 13.3.</p> <p>13.3 Environmental Assessments</p> <p>An EA must be prepared if a proposed undertaking is determined not to be a categorical exclusion by the CRM.</p> <p>In the preparation of an EA the CRM will follow procedures in SOP 3, SOP 4, and SOP 5 to determine impacts of proposed projects to Historic Properties.</p> <ul style="list-style-type: none"> • If EA results in Finding Of No Significant Impact (FONSI) CRM will document decision and provide copy of EA and FONSI to National Park Service Alaska Support Office (NPS-AKSO), and proceed with undertaking. <p>If EA results in a recommendation to prepare an Environmental Impact Statement (EIS) CRM will</p>	Added	See pages 120 - 122

	<p>proceed to 13.4.</p> <p>13.4 Environmental Impact Statements</p> <p>An EIS must be prepared if an EA determines that a project will result in a significant impact to Historic Properties. If this occurs, the CRM will document the decision and initiate the Scoping process. The CRM will invite NPS-AKSO to participate in Scoping process.</p> <ul style="list-style-type: none"> CRM will provide a copy of the completed EIS to NPS-AKSO and proceed with proposal or alternative. 		
383	p.113--Structures within and contributing to the National Landmark need to be protected and rehabilitated. There is no such thing as "too deteriorated" it is a term rather to freely applied. Remedies can be found for those structures within the Nat'l Landmark and National Historic District deemed to have lost its "historical significance through years of inappropriate alteration. The alterations can be reversed and the structures rehabilitated for modern use.	Addressed	See page 120 - 122
384	p.113--SOP 12.1: (pg 16 line 21): How about a provision for cataloging existing as-builts for historic structures, and attempting to find and get copies of existing as-builts where they are not already in the Army's possession? There could also be an on-going program of photo documentation in some sort of prioritized order. Then emergency demolition would be somewhat pre-mitigated.		
385	p.113, SOP 12 - How will consulting parties be notified of inadvertent discoveries and emergency actions, since these are not likely to follow the NEPA process? Or will they follow the NEPA process?		
386	p.113--How does HPC relate to NAGPRA?	See Comment 34.	-----
387	p. 113 - SOP 12. Inadvertent discoveries. The procedures documented here have the potential for considerable delay; i.e., "protected...until a formal determination of eligibility can be made." consultation with Native governments, etc. This does not imply an "expedited process" in the same manner as that identified for Emergency Actions, which require decisions within a 48 hour time-span (p. 115, Line 20). Since the CRM office contains local representatives, decisions can be made on the spot and reviewed by the SHPO by email and/or telephone. A 48 hour deadline could be similarly imposed. For small sites, it would be best if an excavation crew could be available at short notice through a retainer-like MOA with the University of Alaska at either/both Anchorage or Fairbanks, since, in many cases, excavation would be the most expeditious method of eliminating the problem.	Made comment	See page 115 - 119
388	p. 113 -- SOP12 Inadvertent Discoveries and Emergency Actions -- This section only discusses "accidental" discoveries. Reference should be	<p>Comment made</p> <p>Education of military personnel should</p>	See page 115 - 119

	made to rediscovered lost sites, newly communicated locations, and later identified sites. Notification and Consultation with tribes should be automatic for these types. Decisions should be made with tribes whenever possible, including in each step of the process—planning, designing, assessing, evaluating, etc. Including tribes in the work process as a team should be an option. On-site military personnel should be trained in what to look for, which is more than just arrowheads. Archeology need not be present for a site to have cultural importance. It would be helpful to have a list of “Emergency Actions” so that the tribes could indicate a hierarchy of preferences in the event they cannot be consulted due to national security or disaster. Tribes could submit a resolution much like they do for child placements: preference 1, 2, 3, 4, 5 for use only under certain conditions when consultation cannot occur. Verbal contact could be an option. Is there an emergency contact list? A contact list for each presently known site?	be discussed in ICRMP on how USAG-AK cultural resources will deal with educational outreach to the military.	
389	p. 113 -- SOP13 National Historic Landmarks -- Should Local and Regional Landmarks be addressed? Tribes and groups of tribes sometimes need non-tribal community support to have their cultural resources recognized, honored, and given the dignity deserved.	Local and regional landmarks as referred to in this question is addressed under TCPs	
390	p. 114 Line 5. Russ may not always be the CRM representative.	NOTED	-----
391	p.114, Lines 27-28 - I realize that on the next page (pg 115 lines 1-3) that a suggestion is made that a NAGPRA plan will be developed which will address treatment of Native American human burials, and funerary items and objects of cultural patrimony, but the initial protocol that should be followed when human burials are found is not to immediately contact only the Native tribes. A team comprising of the police (military police in our situation), a conservation office, and an archaeologist, and a tribal representative (minimum) should be assembled. Until the burial is confirmed to be Native Alaskan it should be treated as a criminal case and go through the appropriate steps. If the burial is obviously Native Alaskan, there should not be too many problems, but if there is any doubt, we will need to protect the remains until further investigations prove otherwise. I would like to participate in the development of this SOP if the option is available.	Comment made Majority of issues in this comment were noted and will be dealt with in the ICRMP	See page
392	p. 114/SOP 12.2 Inadvertent Discoveries and Emergency Actions: Include provisions of state law-contact the State Troopers if human remains are discovered.	NOTED Issue for ICRMP	-----
393	p.114 – Funerary or cultural patrimony objects are only two types in the broad category we have been referring to above as phenomena of cultural relevance or significance to Tribes. Further discussions are needed to further redefine these to trigger consultation, etc. These need not be eligible	NOTED Should be discussed at next meeting	-----

	for NRHP listing.		
394	p.115, line 3 – reference the NAGPRA section of the ICRMP.	Added	
395	p.117, line 9 – how will this be done? When? Will they be provided documentation? Reports?	By annual report	
396	p.118, line11 – after the sentence ending “National Historic Landmarks” you should add the following sentence: In addition, the AAPs require garrison commanders to obtain comments from the National Park Service where NHLs will be directly and adversely effected by an undertaking.	Section re-written by NPS	
397	Page 118, SOP 13: NHL I assume we [Fairbanks North Star Borough Historic Preservation Commission] will be in the Loop	In NEPA process	-----
498	p.119, SOP 14.1 – again, describe how this information will be distributed through the NEPA process, but not in the NEPA document.	NOTED	-----
499	p. 119 – SOP 14 Importance of confidentiality of information discussed. This includes responsible, accountable use of information provided to USAG-AK. A semi-annual report of interaction was suggested. Might alternate with semi-annual meetings. Report would include list of interaction between USAG-AK and villages, reason for interaction, types of information conveyed/requested, and report on the use of that information. Copies of any reports or other uses of information would be provided to villages that supplied info and upon request to other villages.	Comment on semi-annual meeting noted; will be handled through Government-to-Government program.	-----
400	p. 119 SOP 14 Shared Public Data. Publication is a major, and often neglected, aspect of archeology (and other Cultural Resource investigations). There should be a discussion of websites, newsletters, newspaper displays, etc. There should also be a requirement for any analyses to be published as either a professional paper or similar report for the general public or both. The annual reports should or could be incorporated into a regular publication series.	Added	
401	p. 119 -- SOP14 Shared Public Data -- Historical and Cultural information about tribes and related to tribes should not be restricted from the applicable tribes. Tribes have the right to all the information that a SHPO has in this regard. How each tribe addresses confidentiality within its tribe, is up to each tribe. The source of information is irrelevant. How the Army handles confidences with tribes on a government-to-government basis needs addressing. Tribes would also like to be contacted on public affairs releases and be invited to ensure that information is accurate from their perspective when it is about them, their people, and/or their interests.	NOTED	See appropriate SOPs
402	p. 120 SOP 14.2.2. “Participants in public involvement include (the) public” Really!! How are the “public” and “interested parties” identified?	By NEPA process	-----
403	p.120 - <u>Native corporations should not be referred to as Alaska Native Tribal Organizations.</u>	Corrected	
404	p.121 line 7 – Substitute Native organizations for	Corrected	

	tribal organizations.		
405	p. 122, Line 19. This is the only mention of ARPA permitting and the only responsibility for the BLM that is specified (except for fire protection). See comment for p. 102.	NOTED May be addressed in ICRMP	-----
406	p. 122 -- SOP15 Curation of Artifacts -- Placement should be open for tribal preferences and changes; including placement with a tribe once a facility is available and meets federal standards. A list of currently acceptable facilities would be helpful with decisions. Notification and permission processes for placement and placement changes need to be addressed. Barrowing for special exhibits, such as the new facility in Washington D.C. needs a procedure.	Added	See page 126-27
407	p.123, line 4 – should read, “recovered on USAG-AK managed lands”	Corrected	See page 127
408	p.124 – Note: Inclusion of these uncrystallized SOPs is greatly appreciated. Below are general suggestions.	NOTED	-----
409	<p>p. 124 --SOP 16 – Capacity Building for Tribes</p> <p>USAG-AK can increase Tribal capacity for dealing with cultural issues by providing or facilitating; funds and other support for consultation and coordination on issues, other communications, and participation, technical assistance, equipment and facilities, training, access to cultural sites, phenomena, subject matter, and information.</p> <p>Development of mutually beneficial agreements between USAG-AK and Alaska Tribes can build Tribal capacity significantly. This includes the current Army Alternative Procedures document, MOUs and Scopes of Work such as those in process. Many types of contracts could be facilitated. Cooperative Agreements which will hopefully resume with Alaska Tribes, and USAG-AK may need to develop its internal legal structure to facilitate these and other capacity building initiatives, such as providing Tribes with funding to engage in consultation with USAG-AK.</p>	Added	
410	<p>p. 124 -- SOP 17 0 Process for Tribal Participation and Consultation</p> <p>Consultation with, and participation of relevant Tribes should occur as early and often as needed or desired by the parties. It should be facilitated and remain meaningful/influential throughout relevant projects and processes from their initiation and planning till a (hopefully) mutually satisfactory conclusion is reached. USAG-AK and relevant Tribes may suggest, or cooperatively develop event oriented timelines to best address specific projects/processes.</p> <p>Tribal initiation of consultation, and meaningful participation and consultation may occur at any time throughout projects/process. USAG-AK offers of Tribal consultation and participation should be triggered by relevant and significant events, such</p>	Added	

	<p>as discoveries of cultural phenomena, or initiation of projects/processes potentially affecting cultural phenomena. USAG-AK CRM should be responsible to initiate Tribal consultation on relevant cultural issues. He should remain informed of Tribal concerns, through frequent interaction with relevant Tribes, field, academic, agency and other sources, and utilize this information to decide when consultation/participation is indicated.</p> <p>Government-to-government representatives for consultation purposes and other participants will be designated by USAG-AK and each Tribe, according to their internal procedures. Various DOD and Tribal representatives and participants will be appropriate to fulfill various roles. For example, much work and interaction in service of projects development can be accomplished by staff. Signatories to agreements between the parties will be high level representative officials from each organization.</p>		
411	p. 124 SOP 18. What are “ <u>Gifts</u> between Army and Tribes”?	Addressed	See SOP 18
412	p.124 – SOP 18 -- Make a section/SOP called “Honoring and participating in traditional cultural practices” which would include “gift giving” as a subsection.	Corrected	See SOP 18
413	p. 124 – SOP 18 -- In order to exercise gift-giving occasions, it is recommended that the Army keep a list of what would be meaningful or important as it is learned. Tribes can help by providing lists when known, as well. Eklutna started a list during discussions with elders. Perhaps the Army could provide lists for their personnel, departments, etc. as well. Usually, the selection is done quietly, without the recipient knowing what the gift might be and not knowing that there will be one and not knowing when a gift will be given. Cooperation from others who are close to the recipient does occur. Exchanges are rare to avoid competitive giving.	NOTED	
414	<p>p. 124 -- Gifting occurs as an outward act to express: thank you, appreciation, to honor someone, to conclude something, to begin something, as a greeting, to present to guests such as speakers, to recognize genuine connection, to apologize, to comfort, to recognize a kindness or a favor, to show status or prominence, to mark important events, and for other important or significant occasions and people.</p> <p>Gifting times range from very formal, to independent and personal occasions. Here are examples. Invited speakers are often given gifts to show appreciation and to honor the importance of their presence. When not made clear, gifts given to a chief or President are to the tribe, and not considered personal property unless clearly given to the person. When someone performs a kindness that is not an obligation, such as allowing someone</p>	Added	

	to stay in his or her home, a gift is a way to say thank you at a later time. When someone comes to a village, they might bring something the people would appreciate, perhaps fruit during winter. It is the thought that went into it and the act that shows the value of appreciation. Bringing a gift to an elder's house honors them and shows a sense of cherishment. It is know that when someone gives something they made, such as a blanket to keep an elder warm, that many hours, days, or even weeks went into the making of the item. Gifts are not a requirement. They are selected thoughtfully, to meet a need, to be meaningful to the receiver, to be cherished. They can be to benefit the whole community as well.		
415	p. 124 - SOP16 Capacity Building for Tribes -- It is recommended that team language development with the Army be accomplished through one-on-one work sessions for those tribes that wish to do so. This will help ensure the inclusion of procedures desired by any one tribe and should not exclude ideas and desires by other tribes, including consented modifications.	Added	
416	p. 124 – SOP 16 Partnering is an effective capacity building tool. We support cooperative teamwork, in part, for this reason. Part time or job specific assignments with an army person, function, or task is recommended in addition to subject - matter training. Coordinating calendar availability is important for both sides. Subsistence, community events, and pre-scheduled tribal business could interfere with training attendance when coordination does not occur.	NOTED	
417	p. 124 - SOP17 Process for Tribal Participation and Consultation -- Include timelines for consultation - timelines may be dependant upon the situation.	NOTED	
418	p. 124 - SOP18 Gifts between Army and Tribes -- In our Anchorage discussion, it was agreed to change the title to "Honoring and Participating in Traditional, Cultural Practices." Wording needs to state something like: Because tribes are obligated to carry on their traditions and culture, the Army is permitted to honor and participate in such practices. This will serve as a tool to facilitate tribal obligations, rather than deterring culture through prohibitions.	Added	
419	p. 124 – SOP 18 Suggested subsection content, which may use different wordings, are: Sharing food at business gatherings, Invitations to events, Invitations to speak, Gift guidance between the Army and Tribes, Traditional Trade, Subsistence, Language, Interpretation of Terms, and Other Practices.	Added	
420	p.163/Appendix I: Typographical error. Provide new designations for criteria. Use A,B,C and D.	Corrected	